

Iowa Department of Natural Resources

Title V Operating Permit

Name of Permitted Facility: Winnebago Industries, Inc.

Facility Location: 605 West Crystal Lake Rd, Forest City, IA 50436

Air Quality Operating Permit Number: 05-TV-002-M001

Expiration Date: February 24, 2010

EIQ Number: 92-5528

Facility File Number: 95-01-001

Responsible Official

Name: Mr. Robert J. Olson

Title: Vice President of Manufacturing

Mailing Address: 605 West Crystal Lake Road, Forest City, IA 50436

Phone #: (641) 585-6316

Permit Contact Person for the Facility

Name: Mr. Wayne M. Venzke

Title: Environmental Engineer

Mailing Address: 605 West Crystal Lake Road, Forest City, IA 50436

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This permit is issued in accordance with 567 Iowa Administrative Code Chapter 22, and is issued subject to the terms and conditions contained in this permit. Two Title V Permits are being issued for the CDI, LLC and Winnebago Industries, Inc. - Forest City (Plant No. 95-01-001). These two facilities are considered one stationary source. This permit is for Winnebago Industries, Inc. - Forest City, and another permit is being issued for CDI, LLC.

For the Director of the Department of Natural Resources

Douglas A. Campbell, Supervisor of Air Operating Permits Section

Date

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Abbreviations

acfm.....	actual cubic feet per minute
CE	control equipment
CFR.....	Code of Federal Regulation
°F	degrees Fahrenheit
EIQ.....	emissions inventory questionnaire
gr/dscf	grains per dry standard cubic foot
gr/100 cf.....	grains per one hundred cubic feet
IAC.....	Iowa Administrative Code
IDNR.....	Iowa Department of Natural Resources
MDI.....	4, 4'-methylene diphenyl diisocyanate
MVAC.....	motor vehicle air conditioner
NSPS	new source performance standard
ppmv	parts per million by volume
lb/hr	pounds per hour
lb/MMBtu	pounds per million British thermal units
scfm.....	standard cubic feet per minute
TPY	Tons per year
USEPA.....	United States Environmental Protection Agency

Pollutants

PM.....	particulate matter
PM ₁₀	particulate matter ten microns or less in diameter
SO ₂	sulfur dioxide
NO _x	nitrogen oxides
VOC	volatile organic compound
CO	carbon monoxide
HAP.....	hazardous air pollutant

I. Facility Description and Equipment List

Facility Name: Winnebago Industries, Inc.

Permit Number: 05-TV-002-M001

Facility Description: Primary: Motor Homes Production (SIC 3716)

Equipment List

A. Dust Collectors

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
981-D01-P	981-D01-U	North Sawmill Dust Collector Exhaust
981-D03-P	981-D03-U	South Sawmill Dust Collector Exhaust

B. Mix Rooms

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
951-E01-P	951-E01-U	Vertical Paint Mix Room
970-E01-P	970-E01-U	Customer Service Mix Room
977-E01-P	977-E01-U	Small Parts E-Coat Mix Room
979-E01-P	979-E01-U	Line 4 Paint Mix Room
987-E01-P	987-E01-U	Full Body Paint Mix Room

C. Internally Vented Sources

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
948-F01-P	948-F01-U	Shipout Touch-up Paint Emissions
972-F01-P	972-F01-U	Paint/Adhesive Emissions from Plastics
972-F03-P	972-F03-U	Plastic Grinder Emissions
973-F02-P	973-F02-U	Van Conversion Adhesive Emissions
977-F01-P	977-F01-U	Undercoating Emissions - Chassis Prep Area
977-F02-P	977-F02-U	Welding Emissions (1st & 2nd Floor Chassis Prep)
977-F03-P	977-F03-U	Adhesive/Sealant Spray Emissions – Chassis Prep

C. Internally Vented Sources (continued)

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
977-F04-P	977-F04-U	Large Part E-Coat Paint/Rinse Tank Emissions
979-F01-P	979-F01-U	Motor Home Plant Adhesive/Sealant Emissions
979-F03-P	979-F03-U	Styrofoam Router Dust Collector
979-F04-P	979-F04-U	Motor Home Plant Paint Emissions
981-F02-P	981-F02-U	Staining Emissions from Sawmill
982-F02-P	982-F02-U	Emissions from Line 5 Assembly
991-F01-P	991-F01-U	Extrusion Area Emissions

D. Glue Operations

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
973-G01-P	973-G01-U	Sawmill Reactive Hot Melt Roll Coater
979-G01-P	979-G01-U	MHP Panel Lam. Roll Coaters
979-G02-P	979-G02-U	MHP Panel Lam. Roll Coaters
979-G03-P	979-G03-U	MHP Panel Lam. Roll Coaters
979-G04-P	979-G04-U	MHP Panel Lam. Roll Coaters
979-G05-P	979-G05-U	MHP Panel Lam. Roll Coaters
979-G06-P	979-G06-U	MHP Panel Lam. Roll Coaters
981-G01-P	981-G01-U	Sawmill Glue Machine Exhaust Stack – Roll Applicator
981-G04-P	981-G04-U	Sawmill Glue Machine Exhaust Stack – Roll Applicator
981-G05-P	981-G05-U	Sawmill Glue Machine Exhaust Stack – Roll Applicator
982-G01-P	982-G01-U	Sawmill Reactive Hot Melt Roll Coater

E. Ovens

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
951-O03-P	951-O03-U	Vertical Paint Bake Oven Stack
951-O05-P	951-O05-U	Vertical Paint Bake Oven Stack
977-O02-P	977-O08-U	Large Part Undercoat Entrance Exhaust

E. Ovens (continued)

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
977-O03-P	977-O04-U	Large Part E-Coat Entrance Exhaust Stack (O03)
977-O04-P		Large Part E-Coat Combustion/VOC Exhaust Stack (O04)
977-O05-P		Large Part E-coat Exit Exhaust Stack (O05)
977-O08-P	977-O08-U	Large Part Undercoat Main Combustion/VOC Exhaust
978-O03-P	978-O03-U	Small Part Topcoat Oven Exhaust
978-O04-P	978-O05-U	Small Part E-Coat Secondary Combustion Exhaust
978-O05-P		Small Part E-Coat VOC Exhaust
979-O01-P	979-O01-U	Line 4 Cure Oven Exhaust Stack
990-O01-P	990-O01-U	Powder Paint Dry Off Combustion Exhaust
990-O03-P	990-O03-U	Powder Paint Cure Oven Combustion Exhaust
	990-O04-U	Powder Paint Cure Oven VOC Exhaust

F. Cutting/Grinding/Stripping Operations

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
973-P06-P	973-P06-U	Plastic Grinder
978-P01-P	978-P01-U	Laser Cutting Machine
978-P02-P	978-P02-U	Laser Cutting Machine
978-P03-P	978-P03-U	Laser Cutting Machine
978-P04-P	978-P04-U	Laser Cutting Machine
982-P01-P	982-P01-U	Grinding Booth Exhaust
991-P01-P	991-P01-U	CAPCO Extrusion Line Die Strip Tank Exhaust

G. Spray Booths

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
951-S01-P	951-S01-U	Vertical Paint Silo #1 Exhaust Stack
951-S02-P	951-S02-U	Vertical Paint Silo #2 Exhaust Stack
970-S01-P	970-S01-U	Customer Service Dry Filter Paint Booth - West Stack
970-S02-P		Customer Service Dry Filter Paint Booth - East Stack
970-S03-P	970-S03-U	Customer Service Dry Filter Adhesive Booth – North Stack
970-S04-P		Customer Service Dry Filter Adhesive Booth – South Stack

G. Spray Booths (continued)

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
970-S05-P	970-S05-U	Customer Service Cabinet Bench Adhesive Spray Booth
973-S01-P	973-S01-U	Van Conversion Dry Filter Paint Booth
973-S02-P	973-S02-U	Van Conversion Dry Filter Paint Booth
973-S03-P	973-S03-U	Van Shop Surface Preparation Booth
973-S05-P	973-S05-U	Van Shop Surface Preparation Booth
977-S05-P	977-S05-U	#1 Small Parts Topcoat Paint Booth Stack
977-S06-P	977-S06-U	#2 Small Parts Topcoat Paint Booth Stack
979-S01-P	979-S01-U	Line 4 Basecoat Spray Booth #1, W. Stack
979-S02-P		Line 4 Basecoat Spray Booth #1, E. Stack
979-S03-P	979-S03-U	Line 4 Basecoat Spray Booth #2, W. Stack
979-S04-P		Line 4 Basecoat Spray Booth #2, E. Stack
979-S05-P	979-S05-U	Line 4 Clearcoat Spray Booth., W. Stack
979-S06-P		Line 4 Clearcoat Spray Booth., E. Stack
979-S10-P	979-S10-U	Line 4 Touch-up Spray Booth, W. Stack
979-S11-P		Line 4 Touch-up Spray Booth, E. Stack
979-S08-P	979-S08-U	Off-line Touch-up Spray Booth, E. Stack
979-S09-P		Off-line Touch-up Spray Booth, W. Stack
982-S07-P	982-S07-U	R & D Spray Booth
982-S08-P	982-S08-U	Tooling Resin Spray Booth
982-S09-P	982-S09-U	Touch-up Spray Booth
987-S01-P	987-S01-U	Maintenance Dry Filter Spray Booth
987-S02-P	987-S02-U	Full Body Paint – Basecoat Spray Booth
987-S03-P		Full Body Paint – Basecoat Spray Booth
987-S04-P	987-S04-U	Full Body Paint – Clearcoat Spray Booth
987-S05-P		Full Body Paint – Basecoat Spray Booth

H. Test Vehicle Exhausts

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
979-V01-P	979-V01-U	Motor Home Plant Alignment Pit Vehicle Exhaust
979-V02-P	979-V02-U	Motor Home Plant Road Test Vehicle Exhaust
979-V03-P	979-V03-U	Motor Home Plant Road Test Vehicle Exhaust
979-V04-P	979-V04-U	Motor Home Plant Road Test Vehicle Exhaust

I. Miscellaneous Sources

Emission Point Number	Associated Emission Unit(s) Number (s)	Associated Emission Unit Description
978-C02-P	978-C02-U	Small Part E-Coat Tank Housing Exhaust Stack

Insignificant Equipment List

Insignificant Emission Unit Number	Insignificant Emission Unit Description
951-T01-U	Caustic Rinse Tank
951-O01-P	Vertical Paint Bake Oven Entrance Air Seal Exhaust
951-O02-P	Vertical Paint Bake Oven Exit Air Seal Exhaust
951-O04-P	Vertical Paint Parts Dry-Off Oven Air Seal Exhaust Stack
951-W02-P	Vertical Paint Washer – Burner Exhaust
951-W03-P	Vertical Paint Washer – Exit Exhaust
951-W02-U	Vertical Paint Parts Washer Entrance Exhaust Stack
970-F01-U	Paint Emissions from Customer Service Area
971-F01-U	Adhesive Emissions from Stitchcraft
972-F02-P	Plastics Foam Process Fugitives
973-F03-U	Rotocasting Emissions
973-O01-P	Rotocast 400 Oven Exhaust – Heating
973-C01-P	Rotocast 400 Cooling Chamber Exhaust
973-C02-P	Rotocast 400 Cooling Chamber Exhaust
973-O02-P	Rotocast South 1500 Oven Exhaust – Heating
973-C03-P	Rotocast South 1500 Cooling Chamber Exhaust
973-O04-P	Rotocast West 1500 Oven Exhaust – Heating
973-C04-P	Rotocast West 1500 Cooling Chamber Exhaust
973-O06-P	Rotocast North 1500 Oven Exhaust – Heating
973-C05-P	Rotocast North 1500 Cooling Chamber Exhaust
973-O08-P	Rotocast 430 Oven Exhaust – Heating
973-C06-P	Rotocast 430 Cooling Chamber Exhaust
973-C07-P	Rotocast 430 Cooling Chamber Exhaust
973-T01-P	East Compounding Silo Vent
973-T02-P	West Compounding Silo Vent
977-C01-P	Large Part E-Coat Pretreatment Stage 5 Burner
977-C02-P	Large Part E-Coat Pretreatment Stage 3 Burner
977-C03-P	Large Part E-Coat Pretreatment Stage 1 Burner
977-F05-P	Pretreatment General Ventilation Fugitives
977-O06-P	Large Part E-Coat Cool Down Exhaust Stack
977-T02-P	E-Coat Paint Temporary Storage Tank
977-T04-P	E-Coat Resin Storage Tank
972-F01-U	Adhesive/Paint (Plastic Area)
977-F05-U	Tank 7 Chrome Rinse
977-Z03-P	Small Part Topcoat Flash Tunnel Exhaust
978-C01-U	Small Part E-Coat Post-Rinse Housing Exhaust Stack
978-F01-P	Metal Stamping Fugitives
978-O01-P	Small Parts Topcoat Oven Air Seal Exhaust
978-O02-P	Small Parts E-Coat Oven Air Seal Exhaust

Insignificant Equipment List (continued)

Insignificant Emission Unit Number	Insignificant Emission Unit Description
978-W01-P	Small Parts E-Coat Washer Exit
978-W02-P	Small Parts E-Coat Washer Entrance
978-W03-P	Small Parts E-Coat Washer Indirect Combustion Burner
979-D02-U	Small Dust Collector
979-F02-P	Motor Home Plant Sidewall Router
980-F01-P	R & D Fugitives
981-F01-U	Adhesive Spray Emissions from Sawmill
982-F01-U	Sawmill Research and Development Emissions
982-O01-P	Tool Build Resin Curing Oven
982-W01-P	R&D Building Wand Washer
987-F01-U	Maintenance Area Emissions
987-F02-U	Full Body Paint Emissions
987-F03-P	Maintenance Grinding, Sawing, Punching, and Bending
987-W01-P	Maintenance Wand Washer
990-F01-P	Powder Paint Strip Tank Fugitives
990-F02-P	Powder Paint Spray Can Fugitives
990-O02-P	Powder Paint Cure Oven Entrance Air Seal
990-O04-P	Powder Paint Cure Oven Exit Air Seal
990-W04-P	Powder Paint Washer Exit Exhaust
990-W05-P	Powder Paint Washer – Burner Exhaust
990-W07-U	Powder Paint Parts Washer Entrance Exhaust
991-C01-P	Die Strip Tank Combustion Exhaust Stack
991-C02-P	Die Strip Tank Combustion Exhaust Stack
991-D01-U	Cartridge System Dust Collector
991-F02-P	CAPCO Door Router
991-O01-P	Line 2 Billet Oven – West Exhaust Stack
991-O02-P	Line 1 Billet Oven – East Exhaust Stack
991-O03-P	East Heat Treatment Exhaust Stack
991-O04-P	West Heat Treatment Exhaust Stack
992-F01-P	Steel Shot Blast Machine
DSLGEN-P	Diesel Driven, Portable Electrical Power Generator
DSLTKN-P	Diesel Storage Tank at Maintenance
GASGEN1-P	Gas Powered Emergency Generator – Security
GASGEN2-P	Gas Powered Emergency Generator – Motor Home Plant
GASTNK-P	Gasoline Storage Tank at Chassis
HEAT-P	Total Facility Unit Heater Emissions (291 Heaters)
LPSYS-P	LP System
MAKUP-P	Total Facility Air Makeup Emissions (53 Units)
MTBLST-P	Maintenance Sand Blasting
PH-E01-P	Emergency Fire Pump Diesel Engine Exhaust
PRT-W01-P	Solvent Based Parts Washers
ROADS-P	Chassis Lot Vehicle Traffic Dust
TRB-F01-P	Fugitives from Fuel Tank Removal Processes
TRB-W01-P	Tank Removal Building Wand Washer

II. Plant-Wide Conditions

Facility Name: Winnebago Industries, Inc.

Permit Number: 05-TV-002-M001

Permit conditions are established in accord with 567 Iowa Administrative Code rule 22.108

Permit Duration

The term of this permit is: 5 years

Commencing on: February 25, 2005

Ending on: February 24, 2010

Amendments, modifications and reopenings of the permit shall be obtained in accordance with 567 Iowa Administrative Code rules 22.110 - 22.114. Permits may be suspended, terminated, or revoked as specified in 567 Iowa Administrative Code Rules 22.115.

Emission Limits

Unless specified otherwise in the Source Specific Conditions, the following limitations and supporting regulations apply to all emission points at this plant:

Opacity (visible emissions): 40% opacity

Authority for Requirement: 567 IAC 23.3(2)"d"

Sulfur Dioxide SO₂: 500 parts per million by volume

Authority for Requirement: 567 IAC 23.3(3)"e"

Particulate Matter (state enforceable only)¹:

No person shall cause or allow the emission of particulate matter from any source in excess of the emission standards specified in this chapter, except as provided in 567 – Chapter 24. For sources constructed, modified or reconstructed after July 21, 1999, the emission of particulate matter from any process shall not exceed an emission standard of 0.1 grain per dry standard cubic foot of exhaust gas, except as provided in 567 – 21.2(455B), 23.1(455B), 23.4(455B) and 567 – Chapter 24.

For sources constructed, modified or reconstructed prior to July 21, 1999, the emission of particulate matter from any process shall not exceed the amount determined from Table I, or amount specified in a permit if based on an emission standard of 0.1 grain per standard cubic foot of exhaust gas or established from standards provided in 23.1(455B) and 23.4(455B).

Authority for Requirement: 567 IAC 23.3(2)"a" (as revised 7/21/1999)

¹ Pending approval into Iowa's State Implementation Plan (SIP), paragraph 567 IAC 23.3(2)"a" (as revised 7/21/1999) is considered *state enforceable only*.

Particulate Matter²:

The emission of particulate matter from any process shall not exceed the amount determined from Table I, except as provided in 567 — 21.2(455B), 23.1(455B), 23.4(455B) and 567 — Chapter 24. If the director determines that a process complying with the emission rates specified in Table I is causing or will cause air pollution in a specific area of the state, an emission standard of 0.1 grain per standard cubic foot of exhaust gas may be imposed.

Authority for Requirement: 567 IAC 23.3(2)"a" (prior to 7/21/1999)

Fugitive Dust: Attainment and Unclassified Areas - No person shall allow, cause or permit any materials to be handled, transported or stored; or a building, its appurtenances or a construction haul road to be used, constructed, altered repaired or demolished, with the exception of farming operations or dust generated by ordinary travel on unpaved public roads, without taking reasonable precautions to prevent particulate matter in quantities sufficient to create a nuisance, as defined in Iowa Code section 657.1, from becoming airborne. All persons, with the above exceptions, shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property on which the emissions originate. The highway authority shall be responsible for taking corrective action in those cases where said authority has received complaints of or has actual knowledge of dust conditions which require abatement pursuant to this subrule. Reasonable precautions may include, but not limited to, the following procedures.

1. Use, where practical, of water or chemicals for control of dusts in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land.
2. Application of suitable materials, such as but not limited to asphalt, oil, water or chemicals on unpaved roads, material stockpiles, race tracks and other surfaces which can give rise to airborne dusts.
3. Installation and use of containment or control equipment, to enclose or otherwise limit the emissions resulting from the handling and transfer of dusty materials, such as but not limited to grain, fertilizers or limestone.
4. Covering at all times when in motion, open-bodied vehicles transporting materials likely to give rise to airborne dusts.
5. Prompt removal of earth or other material from paved streets or to which earth or other material has been transported by trucking or earth-moving equipment, erosion by water or other means.

Authority for Requirement: 567 IAC 23.3(2)"c"

Compliance Plan

The owner/operator shall comply with the applicable requirements listed below. The compliance status is based on information provided by the applicant.

Unless otherwise noted in Section III of this permit, Winnebago Industries, Inc. is in compliance with all applicable requirements and shall continue to comply with all such requirements. For those applicable requirements which become effective during the permit term, Winnebago Industries, Inc. shall comply with such requirements in a timely manner.

Authority for Requirement: 567 IAC 22.108(15)

² Paragraph 567 IAC 23.3(2)"a" (prior to 7/21/1999) is the general particulate matter emission standard currently in the Iowa SIP.

Other NESHAP

1. 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production

Parts of this facility will be subject to the Reinforced Plastic Composites Production NESHAP. This NESHAP was published in the Federal Register on April 21, 2003. Tables 2 and 13 referenced in the below requirements can be found in Appendix B of this permit.

§ 63.5800 When do I have to comply with this subpart?

You must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. Facilities meeting an organic HAP emissions standard based on a 12-month rolling average must begin collecting data on the compliance date in order to demonstrate compliance.

§ 63.5905 What notifications must I submit and when?

- (a) You must submit all of the notifications in Table 13 to this subpart that apply to you by the dates specified in Table 13 to this subpart. The notifications are described more fully in 40 CFR part 63, subpart A, referenced in Table 13 to this subpart.
- (b) If you change any information submitted in any notification, you must submit the changes in writing to the Administrator within 15 calendar days after the change.

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Authority for Requirement: 40 CFR Part 63 Subpart WWWW

2. 40 CFR 63 Subpart PPPP – Surface Coating of Plastic Parts and Products

Parts of this facility will be subject to 40 CFR Part 63 Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The notification requirements are outlined below.

Note: For consistency purposes, citations are presented as shown in the CFR.

§ 63.4483 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§ 63.4540, 63.4550, and 63.4560.

- (a) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:
 - (1) If the initial startup of your new or reconstructed affected sources is before April 19, 2004, the compliance date is April 19, 2004.
 - (2) If the initial startup of your new or reconstructed affected source occurs after April 19, 2004, the compliance date is the date of initial startup of your affected source.
- (b) For an existing affected source, the compliance date is the date 3 years after April 19, 2004.

...

- (d) You must meet the notification requirements in § 63.4510 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

§ 63.4510 What notifications must I submit?

- (a) *General.* You must submit the notification in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (b) *Initial notification.* You must submit the initial notification required by § 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after April 19, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after April 19, 2004. If you are complying with another NESHAP that constitutes the predominant activity at your facility under § 63.4481(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.

- (c) *Notification of compliance status.* You must submit the notification of compliance status required by § 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in § 63.4540, § 63.4550, or § 63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in § 63.9(h).
- (1) Company name and address.
 - (2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - (3) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in § 63.4540, § 63.4550, or § 63.4560 that applies to your affected source.
 - (4) Identification of the compliance option or options specified in § 63.4491 that you used on each coating operation in the affected source during the initial compliance period.
 - (5) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
 - (6) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.
 - (i) A description and statement of the cause of the deviation.
 - (ii) If you failed to meet the applicable emission limit in § 63.4490, include all the calculations you used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.
 - (7) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to § 63.4541(a), (b), or (c). You do not need to submit copies of any test reports.
 - (i) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.
 - (ii) Mass fraction of coating solids for one coating.
 - (iii) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.
 - (iv) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of § 63.4551.
 - (8) The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.
 - (i) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 1 of § 63.4541.
 - (ii) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of § 63.4551.
 - (iii) For the emission rate with add-on controls option, provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month, using Equations 1 and 1A through 1C of § 63.4551; the calculation of the total mass of coating solids used each month using Equation 2 of § 63.4551; the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of § 63.4561 and Equations 2, 3, and 3A through 3C of § 63.4561, as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of § 63.4561; and the calculation of the 12-month organic HAP emission rate using Equation 5 of § 63.4561.
 - (9) For the emission rate with add-on controls option, you must include the information specified in paragraphs (c)(9)(i) through (iv) of this section, except that the requirements in paragraphs (c)(9)(i) through (iii) of this section do not apply to solvent recovery systems for which you conduct liquid-liquid material balances according to § 63.4561(j).

- (i) For each emission capture system, a summary of the data and copies of the calculations supporting the determination that the emission capture system is a permanent total enclosure (PTE) or a measurement of the emission capture system efficiency. Include a description of the protocol followed for measuring capture efficiency, summaries of any capture efficiency tests conducted, and any calculations supporting the capture efficiency determination. If you use the data quality objective (DQO) or lower confidence limit (LCL) approach, you must also include the statistical calculations to show you meet the DQO or LCL criteria in appendix A to subpart KK of this part. You do not need to submit complete test reports.
- (ii) A summary of the results of each add-on control device performance test. You do not need to submit complete test reports.
- (iii) A list of each emission capture system's and add-on control device's operating limits and a summary of the data used to calculate those limits.
- (iv) A statement of whether or not you developed and implemented the work practice plan required by § 63.4493.
- (10) If you are complying with a single emission limit representing the predominant activity under § 63.4490(c)(1), include the calculations and supporting information used to demonstrate that this emission limit represents the predominant activity as specified in § 63.4490(c)(1).
- (11) If you are complying with a facility-specific emission limit under § 63.4490(c)(2), include the calculation specified in § 63.4490(c)(2).

Authority for Requirement: 40 CFR Part 63 Subpart PPPP

3. 40 CFR 63 Subpart MMMM – Surface Coating of Miscellaneous Metal Parts and Products
Parts of this facility will be subject to 40 CFR Part 63 Subpart MMMM – National Emissions Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products. The notification requirements are outlined below.

Note: For consistency purposes, citations are presented as shown in the CFR.

§ 63.3883 When do I have to comply with this subpart?

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) through (c) of this section. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§ 63.3940, 63.3950, and 63.3960.

- (c) For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:
 - (3) If the initial startup of your new or reconstructed affected sources is before January 2, 2004, the compliance date is January 2, 2004.
 - (4) If the initial startup of your new or reconstructed affected source occurs after January 2, 2004, the compliance date is the date of initial startup of your affected source.
- (d) For an existing affected source, the compliance date is the date 3 years after January 2, 2004.
- ...
- (e) You must meet the notification requirements in § 63.3910 according to the dates specified in that section and in subpart A of this part. Some of the notifications must be submitted before the compliance dates described in paragraphs (a) through (c) of this section.

§ 63.3910 What notifications must I submit?

- (d) *General.* You must submit the notification in §§ 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in paragraphs (b) and (c) of this section.
- (e) *Initial notification.* You must submit the initial notification required by § 63.9(b) for a new or reconstructed affected source no later than 120 days after initial startup or 120 days after January 2, 2004, whichever is later. For an existing affected source, you must submit the initial notification no later than 1 year after January 2, 2004. If you are complying with another NESHAP that constitutes the predominant activity at your facility under § 63.3881(e)(2) to constitute compliance with this subpart for your plastic coating operations, then you must include a statement to this effect in your initial notification and no other notifications are required under this subpart.

- (f) *Notification of compliance status.* You must submit the notification of compliance status required by § 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in § 63.3940, § 63.3950, or § 63.3960 that applies to your affected source. The notification of compliance status must contain the information specified in paragraphs (c)(1) through (11) of this section and in § 63.9(h).
- (12) Company name and address.
- (13) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (14) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in § 63.3940, § 63.3950, or § 63.3960 that applies to your affected source.
- (15) Identification of the compliance option or options specified in § 63.3891 that you used on each coating operation in the affected source during the initial compliance period.
- (16) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period.
- (17) If you had a deviation, include the information in paragraphs (c)(6)(i) and (ii) of this section.
- (iii) A description and statement of the cause of the deviation.
 - (iv) If you failed to meet the applicable emission limit in § 63.3890, include all the calculations you used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports.
- (18) For each of the data items listed in paragraphs (c)(7)(i) through (iv) of this section that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to § 63.3941(a), (b), or (c). You do not need to submit copies of any test reports.
- (v) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material.
 - (vi) Volume fraction of coating solids for one coating.
 - (vii) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required.
 - (viii) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of § 63.3951.
- (19) The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s) you used, as specified in paragraphs (c)(8)(i) through (iii) of this section.
- (iv) For the compliant material option, provide an example calculation of the organic HAP content for one coating, using Equation 2 of § 63.3941.
 - (v) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total volume of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of § 63.3951.
 - (vi) For the emission rate with add-on controls option, provide the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month, using Equations 1 and 1A through 1C of § 63.3951; the calculation of the total volume of coating solids used each month using Equation 2 of § 63.3951; the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices using Equations 1 and 1A through 1D of § 63.3961 and Equations 2, 3, and 3A through 3C of § 63.3961, as applicable; the calculation of the total mass of organic HAP emissions each month using Equation 4 of § 63.3961; and the calculation of the 12-month organic HAP emission rate using Equation 5 of § 63.3961.
- (20) For the emission rate with add-on controls option, you must include the information specified in paragraphs (c)(9)(i) through (iv) of this section, except that the requirements in paragraphs (c)(9)(i) through (iii) of this section do not apply to solvent recovery systems for which you conduct liquid-liquid material balances according to § 63.3961(j).

- (v) For each emission capture system, a summary of the data and copies of the calculations supporting the determination that the emission capture system is a permanent total enclosure (PTE) or a measurement of the emission capture system efficiency. Include a description of the protocol followed for measuring capture efficiency, summaries of any capture efficiency tests conducted, and any calculations supporting the capture efficiency determination. If you use the data quality objective (DQO) or lower confidence limit (LCL) approach, you must also include the statistical calculations to show you meet the DQO or LCL criteria in appendix A to subpart KK of this part. You do not need to submit complete test reports.
- (vi) A summary of the results of each add-on control device performance test. You do not need to submit complete test reports.
- (vii) A list of each emission capture system's and add-on control device's operating limits and a summary of the data used to calculate those limits.
- (viii) A statement of whether or not you developed and implemented the work practice plan required by § 63.3893.
- (21) If you are complying with a single emission limit representing the predominant activity under § 63.3890(c)(1), include the calculations and supporting information used to demonstrate that this emission limit represents the predominant activity as specified in § 63.3890(c)(1).
- (22) If you are complying with a facility-specific emission limit under § 63.3890(c)(2), include the calculation specified in § 63.3890(c)(2).

Authority for Requirement: 40 CFR Part 63 Subpart MMMM

4. 40 CFR 63 Subpart JJ – Wood Furniture Manufacturing Operations

- The Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations, and Subpart A - General Provisions.

The following sources are subject to JJ requirements:

970-S04-P Customer Service Dry Filter Adhesive Booth – South Stack
 970-S05-P Customer Service Cabinet Bench Adhesive Spray Booth
 981-F02-P Staining Fugitives from Sawmill
 982-S09-P Touch-up Spray Booth

- Excerpts of the applicable Subpart JJ Requirements are shown below. Tables 2 – 6 referenced in the below requirements can be found in Appendix A of this permit.
(Note: Citation numbering is consistent with 40 CFR Part 63. These citations are provided for reference only. If the Subpart JJ Requirements are modified in the future, Winnebago Industries, Inc. is responsible for demonstrating compliance with 40 CFR 63 Subpart JJ as printed in the Federal Register regardless of whether the citations listed below are modified.)

40 CFR 63.802 Emission Limits

- (a) Each permittee of an existing affected source subject to this subpart shall:
- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for existing sources presented in Table 3 of this subpart, using any of the compliance methods in 40 CFR 63.804(a). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the permittee of the affected source shall use the methods presented in 40 CFR 63.803(l)(2) for determining styrene and formaldehyde usage.
 - (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives based on the following criteria:
 - (i) For foam adhesives (contact adhesives used for upholstery operations) used in products that meet the upholstered seating flammability requirements of California Technical Bulletin 116, 117, or 133, the Business and Institutional Furniture Manufacturers Association's (BIFMA's) X5.7, UFAC flammability testing, or any similar requirements from local, State, or Federal fire regulatory agencies, the VHAP content of the adhesive shall not exceed 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied; or
 - (ii) For all other contact adhesives (including foam adhesives used in products that do not meet the standards presented in (a)(2)(i), but excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, the VHAP content of the adhesive shall not exceed 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied.
 - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.
- (b) Each permittee of a new affected source subject to this subpart shall:
- (1) Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in Table 3 of this subpart using any of the compliance methods in 40 CFR 63.804(d). To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the permittee of the affected source shall use the methods presented in 40 CFR 63.803(l)(2) for determining styrene and formaldehyde usage.
 - (2) Limit VHAP emissions from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied, using either of the compliance methods in 40 CFR 63.804(e).
 - (3) Limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 kg VOC/kg solids (0.8 lb VOC/lb solids), as applied.

40 CFR 63.803 Work Practice Standards

- (a) Work practice implementation plan.
- (1) Each owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of this section. The plan shall be developed no more than 60 days after the compliance date.
 - (2) The written work practice implementation plan shall be available for inspection by the Administrator (or delegated State, local, or Tribal authority) upon request. If the Administrator (or delegated State, local, or Tribal authority) determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator (or delegated State, local, or Tribal authority) may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
 - (3) The inspection and maintenance plan required by paragraph (c) of this section and the formulation assessment plan for finishing operations required by paragraph (l) of this section are also reviewable by the Administrator (or delegated State, local, or Tribal authority).
- (b) Operator training course. Each permittee of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the compliance date of the standard, shall be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, shall be trained within six months of the compliance date of the standard. All

personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

- (1) A list of all current personnel by name and job description that are required to be trained;
- (2) An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- (3) Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- (4) A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

(c) Inspection and maintenance plan. Each permittee of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

- (1) A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- (2) An inspection schedule;
- (3) Methods for documenting the date and results of each inspection and any repairs that were made;
- (4) The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (i) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - (ii) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

(d) Cleaning and washoff solvent accounting system. Each permittee of an affected source shall develop an organic HAP solvent accounting form to record:

- (1) The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801 of this subpart;
- (2) The number of pieces washed off, and the reason for the washoff; and
- (3) The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

(e) Chemical composition of cleaning and washoff solvents. Each permittee of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4, in concentrations subject to MSDS reporting as required by OSHA.

(f) Spray booth cleaning. Each permittee of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

(g) Storage requirements. Each permittee of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

(h) Application equipment requirements. Each permittee of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

- (1) To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
- (2) For touchup and repair under the following conditions:
 - (i) The touchup and repair occurs after completion of the finishing operation; or
 - (ii) The touchup and repair occurs after the application of stain and before the application of any other

type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

- (3) When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
- (4) When emissions from the finishing application station are directed to a control device;
- (5) The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- (6) The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Permitting authority a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - (i) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - (ii) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

(i) Line cleaning. Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

(j) Gun cleaning. Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

(k) Washoff operations. Each owner or operator of an affected source shall control emissions from washoff operations by:

- (1) Using normally closed tanks for washoff; and
- (2) Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(l) Formulation assessment plan for finishing operations. Each permittee of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

- (1) Identifies VHAP from the list presented in Table 5 of this subpart that are being used in finishing operations by the affected source;
- (2) Establishes a baseline level of usage by the affected source, for each VHAP identified in (l)(1). The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in (l)(1). For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 40 CFR63.805(d) or (e).
- (3) Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
- (4) If, after November 1998, the annual usage of the VHAP identified in (l)(1) exceeds its baseline level, then the permittee of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:
 - (i) The exceedance is no more than 15.0 percent above the baseline level;
 - (ii) Usage of the VHAP is below the de minimis level presented in Table 5 of this subpart for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 CFR63.805(d) or (e);
 - (iii) The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
 - (iv) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

- (5) If none of the above explanations are the reason for the increase, the permittee shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and permittee. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
- (6) If, after November 1998, an affected source uses a VHAP of potential concern listed in Table 6 of this subpart for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in table 6 of this subpart for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraphs (1)(4)(i) through (1)(4)(iv) of this section, the affected source shall follow the procedures established in (1)(5) of this section.

40 CFR 63.804 Compliance procedures and monitoring requirements

(a) The permittee of an existing affected source subject to 40 CFR63.802(a)(1) shall comply with those provisions using any of the methods presented in 40 CFR63.804(a)(1)-(a)(4).

- (1) Calculate the average VHAP content for all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 1.0;

$$E = \frac{(M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots S_nW_n)}{(M_{c1} + M_{c2} + \dots + M_{cn})} \quad \text{Equation 1}$$

- (2) Use compliant finishing materials according to the following criteria:
 - (i) Demonstrate that each stain, sealer, and topcoat has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight by maintaining certified product data sheets for each coating and thinner; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated at the affected source is formulated using a finishing material containing no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent VHAP by weight.
- (3) Use a control system with an overall control efficiency (R) such that the value of E_{ac} in Equation 2 is no greater than 1.0.

$$R = [(E_{bc} - E_{ac})/E_{bc}](100) \quad \text{Equation 2}$$

The value of E_{bc} in Equation 2 shall be calculated using Equation 1; or

- (4) Use any combination of an averaging approach, as described in (a)(1), compliant finishing materials, as described in (a)(2), and a control system, as described in (a)(3).

(b) The permittee of an affected source subject to 40 CFR63.802(a)(2)(i) shall comply with the provisions by using compliant foam adhesives with a VHAP content no greater than 1.8 kg VHAP/kg solids (1.8 lb VHAP/lb solids), as applied.

(c) The permittee of an affected source subject to 40 CFR63.802(a)(2)(ii) shall comply with those provisions by using either of the methods presented in 40 CFR63.804(c)(1) and (c)(2).

- (1) Use compliant contact adhesives with a VHAP content no greater than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied; or

- (2) Use a control system with an overall control efficiency (R) such that the value of G_{ac} is no greater than 1.0.

$$R = [(G_{bc} - G_{ac})/G_{bc}] (100)$$

Equation 3

(d) The permittee of a new affected source subject to 40 CFR63.802(b)(1) may comply with those provisions by using any of the following methods:

- (1) Calculate the average VHAP content across all finishing materials used at the facility using Equation 1, and maintain a value of E no greater than 0.8;
- (2) Use compliant finishing materials according to the following criteria:
 - (i) Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight;
 - (ii) Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and
 - (iii) Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) and a thinner containing no more than 3.0 percent HAP by weight.
- (3) Use a control system with an overall control efficiency (R) such that the value of E_{ac} in Equation 4 is no greater than 0.8.

$$R = [(E_{bc} - E_{ac})/E_{bc}](100)$$

Equation 4

The value of E_{bc} in Equation 4 shall be calculated using Equation 1; or

- (4) Use any combination of an averaging approach, as described in (d)(1), compliant finishing materials, as described in (d)(2), and a control system, as described in (d)(3).
- (e) The permittee of a new affected source subject to 40 CFR63.802(b)(2) shall comply with the provisions using either of the following methods:
- (1) Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; or
 - (2) Use a control system with an overall control efficiency (R) such that the value of G_{ac} in Equation 3 is no greater than 0.2.
- (f) Initial compliance.
- (1) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(1) or (d)(1) shall submit the results of the averaging calculation (Equation 1) for the first month with the initial compliance status report required by 40 CFR63.807(b). The first month's calculation shall include data for the entire month in which the compliance date falls. For example, if the source's compliance date is November 21, 1997, the averaging calculation shall include data from November 1, 1997 to November 30, 1997.
 - (2) Owners or operators of an affected source subject to the provisions of 40 CFR 63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR 63.804(a)(2) or (d)(2) shall submit an initial compliance status report, as required by 40 CFR 63.807(b), stating that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, are being used by the affected source.
 - (3) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that are complying through the procedures established in 40 CFR63.804(a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate initial compliance by:
 - (i) Submitting an initial compliance status report, as required by 40 CFR63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, and compliant thinners are being used; or
 - (ii) Submitting an initial compliance status report, as required by 40 CFR63.807(b), stating that compliant coatings, as determined by the VHAP content of the coating in the reservoir, are being used; the viscosity of the coating in the reservoir is being monitored; and compliant thinners are being used. The affected

source shall also submit data that demonstrate that viscosity is an appropriate parameter for demonstrating compliance.

- (4) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR63.804(a)(3) or (d)(3) shall demonstrate initial compliance by:
 - (i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;
 - (ii) Conducting an initial performance test as required under 40 CFR63.7 using the procedures and test methods listed in 40 CFR63.7 and 40 CFR63.805(c) and (d) or (e);
 - (iii) Calculating the overall control efficiency (R) following the procedures in 40 CFR63.805(d) or (e); and
 - (iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.
 - (A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.
 - (B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst bed shall be the operating parameter.
 - (C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.
 - (D) For compliance with a carbon adsorber, the operating parameters shall be the total regeneration mass stream flow for each regeneration cycle and the carbon bed temperature after each regeneration, or the concentration level of organic compounds exiting the adsorber, unless the permittee requests and receives approval from the Permitting authority to establish other operating parameters.
 - (E) For compliance with a control device not listed in this section, one or more operating parameter values shall be established using the procedures identified in 40 CFR63.804(g)(4)(vi).
 - (v) Owners or operators complying with 40 CFR63.804(f)(4) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating parameter values, as appropriate, that demonstrate compliance with the standards, during the three test runs required by 40 CFR63.805(c)(1).
- (5) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(2) or (b)(2) that comply through the procedures established in 40 CFR63.804(b), (c)(1), or (e)(1), shall submit an initial compliance status report, as required by 40 CFR63.807(b), stating that compliant contact adhesives are being used by the affected source.
- (6) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(2)(ii) or (b)(2) that comply through the procedures established in 40 CFR63.804(c)(2) or (e)(2), shall demonstrate initial compliance by:
 - (i) Submitting a monitoring plan that identifies each operating parameter to be monitored for the capture device and discusses why each parameter is appropriate for demonstrating continuous compliance;
 - (ii) Conducting an initial performance test as required under 40 CFR63.7 using the procedures and test methods listed in 40 CFR63.7 and 40 CFR63.805(c) and (d) or (e);
 - (iii) Calculating the overall control efficiency (R) following the procedures in 40 CFR63.805(d) or (e); and
 - (iv) Determining those operating conditions critical to determining compliance and establishing one or more operating parameters that will ensure compliance with the standard.
 - (A) For compliance with a thermal incinerator, minimum combustion temperature shall be the operating parameter.
 - (B) For compliance with a catalytic incinerator equipped with a fixed catalyst bed, the minimum gas temperature both upstream and downstream of the catalyst shall be the operating parameter.
 - (C) For compliance with a catalytic incinerator equipped with a fluidized catalyst bed, the minimum gas temperature upstream of the catalyst bed and the pressure drop across the catalyst bed shall be the operating parameters.
 - (v) Owners or operators complying with 40 CFR63.804(f)(6) shall calculate each site-specific operating parameter value as the arithmetic average of the maximum or minimum operating values as appropriate, that demonstrate compliance with the standards, during the three test runs required by 40 CFR63.805(c)(1).

- (7) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(3) or (b)(3) shall submit an initial compliance status report, as required by 40 CFR63.807(b), stating that compliant strippable spray booth coatings are being used by the affected source.
- (8) Owners or operators of an affected source subject to the work practice standards in 40 CFR63.803 shall submit an initial compliance status report, as required by 40 CFR63.807(b), stating that the work practice implementation plan has been developed and procedures have been established for implementing the provisions of the plan.

(g) Continuous compliance demonstrations.

- (1) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR63.804(a)(1) or (d)(1) shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (i) The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources or 0.8 for new sources. An affected source is in violation of the standard if E is greater than 1.0 for existing sources or 0.8 for new sources for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (2) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR63.804(a)(2) or (d)(2) shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (i) The compliance certification shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (3) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that are complying through the procedures established in 40 CFR63.804(a)(2) or (d)(2) and are applying coatings using continuous coaters shall demonstrate continuous compliance by following the procedures in (i) or (ii) of this paragraph.
 - (i) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (A) The compliance certification shall state that compliant coatings have been used each day in the semiannual reporting period, or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - (B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
 - (ii) Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using compliant thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvent additions, and submitting a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (A) The compliance certification shall state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting

- period. Additionally, the certification shall state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is, the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period.
- (B) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
 - (C) An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in 40 CFR63.804(a)(2) or (d)(2), as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating.
- (4) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(1) or (b)(1) that comply through the procedures established in 40 CFR63.804(a)(3) or (d)(3) shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to manufacturer's specifications. The permittee shall also submit the excess emissions and continuous monitoring system performance report and summary report required by 40 CFR63.807(d) and 40 CFR63.10(e) of subpart A.
- (i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with 40 CFR63.804(f)(6)(i) is required.
 - (ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.
 - (A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.
 - (B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.
 - (C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to determine the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.
 - (iii) Where a carbon adsorber is used one of the following is required:
 - (A) An integrating stream flow monitoring device having an accuracy of ± 10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ± 1 percent of the temperature being monitored or $\pm 0.50^\circ\text{C}$, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;
 - (B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or
 - (C) Any other monitoring device that has been approved by the Permitting authority in accordance with 40 CFR63.804(f)(4) (iv)(D).
 - (iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.
 - (v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.
 - (vi) An permittee who uses a control device not listed in 40 CFR63.804(f)(4) shall submit, for the Permitting authority's approval, a description of the device, test data verifying performance, and appropriate site-specific operating parameters that will be monitored to demonstrate continuous compliance with the standard.
- (5) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(2)(i) or (ii) or (b)(2) that comply through the procedures established in 40 CFR63.804(b), (c)(1), or (e)(1), shall submit a compliance certification with the semiannual report required by 40 CFR63.807(c).
- (i) The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (6) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(2)(ii) or (b)(2) that comply through the procedures established in 40 CFR63.804(c)(2) or (e)(2), shall demonstrate continuous compliance by installing, calibrating, maintaining, and operating the appropriate monitoring equipment according to the manufacturer's specifications. The permittee shall also submit the excess emissions and continuous monitoring system performance report and summary report required by 40 CFR63.807(d) and 40 CFR63.10(e) of subpart A of this part.
 - (i) Where a capture/control device is used, a device to monitor each site-specific operating parameter established in accordance with 40 CFR63.804(f)(6)(i) is required.
 - (ii) Where an incinerator is used, a temperature monitoring device equipped with a continuous recorder is required.
 - (A) Where a thermal incinerator is used, a temperature monitoring device shall be installed in the firebox or in the ductwork immediately downstream of the firebox in a position before any substantial heat exchange occurs.
 - (B) Where a catalytic incinerator equipped with a fixed catalyst bed is used, temperature monitoring devices shall be installed in the gas stream immediately before and after the catalyst bed.
 - (C) Where a catalytic incinerator equipped with a fluidized catalyst bed is used, a temperature monitoring device shall be installed in the gas stream immediately before the bed. In addition, a pressure monitoring device shall be installed to measure the pressure drop across the catalyst bed. The pressure drop shall be measured monthly at a constant flow rate.
 - (iii) Where a carbon adsorber is used one of the following is required:
 - (A) An integrating stream flow monitoring device having an accuracy of ± 10 percent, capable of recording the total regeneration stream mass flow for each regeneration cycle; and a carbon bed temperature monitoring device, having an accuracy of ± 1 percent of the temperature being monitored or $\pm 0.50^\circ\text{C}$, whichever is greater, and capable of recording the carbon bed temperature after each regeneration and within 15 minutes of completing any cooling cycle;
 - (B) An organic monitoring device, equipped with a continuous recorder, to indicate the concentration level of organic compounds exiting the carbon adsorber; or
 - (C) Any other monitoring device that has been approved by the Permitting authority in accordance with 40 CFR63.804(f)(4) (iv)(D).
 - (iv) Owners or operators of an affected source shall not operate the capture or control device at a daily average value greater than or less than (as appropriate) the operating parameter values. The daily average value shall be calculated as the average of all values for a monitored parameter recorded during the operating day.
 - (v) Owners or operators of an affected source that are complying through the use of a catalytic incinerator equipped with a fluidized catalyst bed shall maintain a constant pressure drop, measured monthly, across the catalyst bed.
 - (vi) An permittee using a control device not listed in this section shall submit to the Permitting authority a description of the device, test data verifying the performance of the device, and appropriate operating parameter values that will be monitored to demonstrate continuous compliance with the standard. Compliance using this device is subject to the Permitting authority's approval.
- (7) Owners or operators of an affected source subject to the provisions of 40 CFR63.802(a)(3) or (b)(3) shall submit a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (i) The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard.
 - (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
- (8) Owners or operators of an affected source subject to the work practice standards in 40 CFR63.803 shall submit a compliance certification with the semiannual report required by 40 CFR63.807(c).
 - (i) The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

- (ii) The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.

40 CFR 63.805 Performance Test Methods

(a) The EPA Method 311 of Appendix A of part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Permitting authority that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The permittee of an affected source may request approval from the Permitting authority to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA-340/1-91-010. (Docket No. A-93-10, Item No. IV-A-1).

40 CFR 63.806 Recordkeeping Requirements

- (a) The permittee of an affected source subject to this subpart shall fulfill all recordkeeping requirements of 40 CFR 63.10 of subpart A, according to the applicability criteria in 40 CFR 63.800(d) of this subpart.
- (b) The permittee of an affected source subject to the emission limits in 40 CFR 63.802 of this subpart shall maintain records of the following:
- (1) A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in 40 CFR 63.802; and
 - (2) The VHAP content, in kg VHAP/kg solids (lb VHAP/lb solids), as applied, of each finishing material and contact adhesive subject to the emission limits in 40 CFR 63.802; and
 - (3) The VOC content, in kg VOC/kg solids (lb VOC/lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 CFR 63.802(a)(3) or (b)(3).
- (c) The permittee of an affected source following the compliance method in 40 CFR 63.804(a)(1) or (d)(1) shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
- (e) The permittee of an affected source subject to the work practice standards in 40 CFR 63.803 of this subpart shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
- (1) Records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;
 - (2) Records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);
 - (3) Records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);
 - (4) Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 CFR 63.803(h)(5).
 - (5) Records associated with the formulation assessment plan required by 40 CFR 63.803(i); and
 - (6) Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (h) The permittee of an affected source subject to the emission limits in 40 CFR 63.802 and following the compliance provisions of 40 CFR 63.804(f)(1), (2), (3), (5), (7) and (8) and 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8) shall maintain records of the compliance certifications submitted in accordance with 40 CFR 63.807(c) for each semiannual period following the compliance date.

(i) The permittee of an affected source shall maintain records of all other information submitted with the compliance status report required by 40 CFR63.9(h) and 40 CFR63.807(b) and the semiannual reports required by 40 CFR63.807(c).

(j) The permittee of an affected source shall maintain all records in accordance with the requirements of 40 CFR63.10(b)(1).

40 CFR 63.807 Reporting Requirements

(a) The permittee of an affected source subject to this subpart shall fulfill all reporting requirements of 40 CFR63.7 through 40 CFR 63.10 of subpart A (General Provisions) according to the applicability criteria in 40 CFR 63.800(d) of this subpart.

(c) The permittee of an affected source demonstrating compliance in accordance with 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8) shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

- (1) The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.
- (2) Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.
- (3) The semiannual reports shall include the information required by 40 CFR 63.804(g)(1), (2), (3), (5), (7), and (8), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.
- (4) The frequency of the reports required by paragraph (c) of this section shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

(e) The permittee of an affected source required to provide a written notification under 40 CFR63.803(1)(4) shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

40 CFR 63.4, Prohibited Activities and Circumvention:

(a) *Prohibited Activities.*

- (1) The permittee shall not operate any affected source in violation of the requirements of this part except under:
 - (i) An extension of compliance granted by the Administrator under this part; or
 - (ii) An extension of compliance granted under this part by a State with an approved permit program; or
 - (iii) An exemption from compliance is granted by the President under section 112(i)(4) of the Clean Air Act.
- (2) The permittee shall not fail to keep records, notify, report, or revise reports as required under this part.

(b) *Circumvention.* The permittee shall not build, erect, install, or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Such concealment includes, but is not limited to:

- (1) The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere.
- (2) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.
- (3) The fragmentation of an operation such that the operation avoids regulation by a relevant standard.

(c) *Severability.* Notwithstanding any requirement incorporated into a Title V permit obtained by an owner or operator subject to the provisions of this part, the provisions of this part are federally enforceable.

40 CFR 63.6, Compliance with standards and maintenance requirements

(e) *Operation and maintenance requirements.*

- (1)(i) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent

with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.

- (2)(i) Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the startup, shutdown, and malfunction plan, review of operation and maintenance records, and inspection of the source).

Authority for Requirement: 40 CFR 63 Subpart JJ and Subpart A (General Provisions)
567 IAC 23.1(4)"aj"

III. Emission Point-Specific Conditions

Facility Name: Winnebago Industries, Inc.
Permit Number: 05-TV-002-M001

Emission Point ID: Dust Collectors – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
981-D01-P	981-D01-U	North Sawmill Dust Collector Exhaust	Sawdust from Woodworking	372.66 lb./hr	981-D01-C	Cyclone with Bag Filter (2-Stage Collector)
981-D03-P	981-D03-U	South Sawmill Dust Collector Exhaust	Sawdust from Woodworking	372.66 lb./hr	981-D03-C	Cyclone with Bag Filter (2-Stage Collector)

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
981-D01-P	981-D01-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM ₁₀	0.66 lb./hr	-	96-A-093-S1
		PM	1.33 lbs./hr ⁽¹⁾	567 IAC 23.3(2)"a"	-
981-D03-P	981-D03-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM ₁₀	0.66 lb./hr	-	96-A-094-S1
		PM	1.33 lbs./hr ⁽¹⁾	567 IAC 23.3(2)"a"	-

⁽¹⁾ based on a process weight rate of 372.66 lbs./hr.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- Emissions must be vented into the building from the period beginning November 1 until March 31 of the next year.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- Records must be kept which show the time period which the emissions were vented inside the building.

Authority for Requirement: Iowa DNR Construction Permit 96-A-093-S1 (981-D01-P)

Authority for Requirement: Iowa DNR Construction Permit 96-A-094-S1 (981-D03-P)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
981-D01-P	96-A-093-S1	30.7	-	4 feet	-	32,170 scfm
981-D03-P	96-A-094-S1	31	-	4 feet	-	32,170 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack Testing:

Pollutant – PM₁₀⁽¹⁾

1st Stack Test to be Completed by – February 24, 2007

Test Method – 201A with 202, 40 CFR 51⁽²⁾

Authority for Requirement – 567 IAC 22.108(3)"b"

Pollutant – Particulate Matter⁽¹⁾

1st Stack Test to be Completed by – February 24, 2007

Test Method – Iowa Compliance Sampling Manual⁽²⁾

Authority for Requirement – 567 IAC 22.108(3)"b"

⁽¹⁾ Representative Testing: Stack testing is only required on one of these two emission points, 981-D01-P or 981-D03-P, to demonstrate compliance for both emission points. However, if the results of stack testing on the representative source exceed the emission limit(s), then both emission points shall be considered out of compliance with the emission limit(s).

⁽²⁾ or an approved alternative

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Mix Rooms – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID
951-E01-P	951-E01-U	Vertical Paint Mix Room	Paint, Solvents, Sealers	14.4 drums/day	None
970-E01-P	970-E01-U	Customer Service Mix Room	Paint and Thinners	0.49 drums/day	None
977-E01-P	977-E01-U	Small Parts E-Coat Mix Room	Paints and Solvents	1 drum/day	None
979-E01-P	979-E01-U	Line 4 Paint Mix Room	Paints and Solvents	1.34 drums/day	None
987-E01-P	987-E01-U	Full Body Paint Mix Room	Paints and Thinners	-	None

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
951-E01-P	951-E01-U	No emission limits at this time. All VOC emissions from this source have been assigned to emission points 951-S01-P and 951-S02-P.		-	96-A-1321
970-E01-P	970-E01-U	No emission limits at this time. All VOC emissions from this source have been assigned to emission points 970-S01-P and 970-S02-P.		-	96-A-1319
977-E01-P	977-E01-U	No emission limits at this time. All VOC emissions from this source have been assigned to emission points 977-S05-P and 977-S06-P.		-	96-A-098
979-E01-P	979-E01-U	No emission limits at this time. All VOC emissions from this source have been assigned to emission points 979-S01 through 979-S04.		-	96-A-104

(continued)

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
987-E01-P	987-E01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	02-A-307
		VOC	VOC emissions from this paint mix room are accounted for under the bubble limit in permits 98-A-211-S1 and 00-A-601 for 37.02 tpy and the bubble limit in permits 98-A-212-S1 and 00-A-602 for 29.02 tpy. The four permitted emission points of 98-A-211-S1, 00-A-601, 98-A-212-S1, and 00-A-602 represent the Full Body Paint Booths that this paint mix room supplies.	-	02-A-307

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP:

Emission Units 951-E01-U and 977-E01-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Emission Units 970-E01-U, 979-E01-U, and 987-E01-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products and 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
951-E01-P	96-A-1321	2	-	18	Ambient	3,000 scfm
970-E01-P	96-A-1319	5.5	-	12	Ambient	1,000 scfm
977-E01-P	96-A-098	-	-	-	-	-
979-E01-P	96-A-104	-	-	-	-	-
987-E01-P	02-A-307	15	Downward	12	Ambient	2,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Internally Vented Sources – See Table Below.

Associated Equipment

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity	Control Equipment Number	Control Equipment Description
948-F01-P	948-F01-U	Shipout Touch-up Paint Emissions	Paint, Solvent, Sealers	0.718 gal/hr	None	None
972-F01-P	972-F01-U	Paint/Adhesive Emissions from Plastics	Paint & Adhesives	1.6 gal/hr	None	None
972-F03-P	972-F03-U	Plastic Grinder Emissions	Scrap Plastic	789.5 lb/hr	972-F03-C	Cyclone with Bag Filter
973-F02-P	973-F02-U	Van Conversion Adhesive Emissions	Adhesives	0.398 gal/hr	None	None
977-F01-P	977-F01-U	Undercoating Emissions - Chassis Prep Area	Undercoating & Paint	5.5 gal/hr	None	None
977-F02-P	977-F02-U	Welding Emissions (1 st & 2 nd Floor)	Welding Wire	75.6 lb/hr	None	None
977-F03-P	977-F03-U	Adhesive/Sealant Spray Emissions - Chassis Prep	Adhesives & Sealants	7.594 gal/hr	None	None
977-F04-P	977-F04-U	Large Part E-Coat Paint/Rinse Tank Emissions	E-coat Epoxy Resins & Solvent	5.694 gal/hr	None	None
979-F01-P	979-F01-U	Motor Home Adhesive/Sealant Emissions	Adhesives & Sealants	19.36 gal/hr	None	None
979-F03-P	979-F03-U	Styrofoam Router Dust Collector	Styrofoam	42 lb/hr	979-F03-C	Bag Filter
979-F04-P	979-F04-U	Motor Home Plant Paint Emissions	Paints & Solvents	1.12 gal/hr	None	None
981-F02-P	981-F02-U	Staining Emissions from Sawmill	Stains	0.43 lb/hr	None	None
982-F02-P	982-F02-U	Emissions from Line 5 Assembly	Paint, Solvents, Sealers, Adhesives	1.1 gal/hr	None	None
991-F01-P	991-F01-U	Extrusion Area Emissions	Solvents, Sealers, Paint	0.34 gal/hr	None	None

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Applicable Requirements

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

NESHAP:

Emission Units 948-F01-U, 972-F01-U, 973-F02-U, 979-F01-U, 979-F04-U, and 982-F02-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products and 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Units 977-F01-U, 977-F03-U, and 977-F04-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Unit 981-F02-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart JJ, Wood Furniture Manufacturing Operations. Please refer to p. 16 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Glue – MHP Panel Lam. Roll Coaters – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID
979-G01-P	979-G01-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None
979-G02-P	979-G02-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None
979-G03-P	979-G03-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None
979-G04-P	979-G04-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None
979-G05-P	979-G05-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None
979-G06-P	979-G06-U	MHP Panel Lam. Roll Coaters	Reactive Hot Melt Adhesive	88 lbs./hr melted glue	None

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
979-G01-P	979-G01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1057
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1057
		VOC	39.4 tons/year ⁽²⁾	-	01-A-1057
979-G02-P	979-G02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1059
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1059
		VOC	39.4 tons/year ⁽²⁾	-	01-A-1059
979-G03-P	979-G03-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1062
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1062
		VOC	39.4 tons/year ⁽²⁾	-	01-A-1062
979-G04-P	979-G04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1063
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1063
		VOC	39.4 tons/year ⁽²⁾	-	01-A-1063
979-G05-P	979-G05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1064
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1064
		VOC	39.4 tons/year ⁽²⁾	-	01-A-1064
979-G06-P	979-G06-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1065
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1065
		VOC	9.4 tons/year	-	01-A-1065

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of no visible emissions, other than during startup, shutdown, or malfunction, will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Bubble Limit of 39.4 tons per rolling 12-month period for the following units: EU-979-G01-U, EU-979-G02-U, EU-979-G03-U, EU-979-G04-U, and EU-979-G05-U (EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, and EP-979-G05-P).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- Bubble Limit of 39.4 tons per rolling 12-month period for the following units: EU-979-G01-U, EU-979-G02-U, EU-979-G03-U, EU-979-G04-U, and EU-979-G05-U (EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, and EP-979-G05-P). This 39.4 ton per rolling 12-month period limit is equivalent to using 3,940,200 pounds (447,750 gallons) or less of material per rolling 12-month period based upon a VOC / HAP content of 2%.
- Bubble Limit of 9.4 tons per rolling 12-month period for the following units: EU-979-G06-U (EP-979-G06-P). This 9.4 ton per rolling 12-month period limit is equivalent to using 939,840 pounds (106,800 gallons) or less of material per rolling 12-month period based upon a VOC / HAP content of 2%.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- Record on a rolling 12-month basis the quantity of material used for the following five emission units: EU-979-G01-U, EU-979-G02-U, EU-979-G03-U, EU-979-G04-U, and EU-979-G05-U (EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, and EP-979-G05-P).

Authority for Requirement: Iowa DNR Construction Permit 01-A-1057 (979-G01-P)
Iowa DNR Construction Permit 01-A-1059 (979-G02-P)
Iowa DNR Construction Permit 01-A-1062 (979-G03-P)
Iowa DNR Construction Permit 01-A-1063 (979-G04-P)
Iowa DNR Construction Permit 01-A-1064 (979-G05-P)

- Record the VOC content of all material used in the following five emission units: EU-979-G01-U, EU-979-G02-U, EU-979-G03-U, EU-979-G04-U, and EU-979-G05-U (EP-979-G01-P, EP-979-G02-P, EP-979-G03-P, EP-979-G04-P, and EP-979-G05-P).

- Calculate and record total monthly and 12-month rolling totals of VOC emissions from the following five emission units: EU-979-GO1-U, EU-979-GO2-U, EU-979-GO3-U, EU-979-GO4-U, and EU-979-GO5-U (EP-979-GO1-P, EP-979-GO2-P, EP-979-GO3-P, EP-979-GO4-P, and EP-979-GO5-P).

Authority for Requirement: 567 IAC 22.108(3)"b"

- Record on a rolling 12-month basis the quantity of material used for the following emission unit: EU-979-GO6-U (EP-979-GO6-P).

Authority for Requirement: Iowa DNR Construction Permit 01-A-1065

NESHAP:

Emission Units 979-G01-U, 979-G02-U, 979-G03-U, 979-G04-U, 979-G05-U, and 979-G06-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products and 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
979-G01-P	01-A-1057	30	Downward	8	Ambient	500 scfm
979-G02-P	01-A-1059	30	Downward	8	Ambient	500 scfm
979-G03-P	01-A-1062	36	Downward	8	Ambient	500 scfm
979-G04-P	01-A-1063	38	Downward	8	Ambient	500 scfm
979-G05-P	01-A-1064	38	Downward	8	Ambient	500 scfm
979-G06-P	01-A-1065	36	Downward	8	Ambient	500 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Glue – Sawmill Glue Machines – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID
973-G01-P	973-G01-U	Sawmill Reactive Hot Melt Roll Coater	Reactive Hot Melt Adhesive	166.7 lbs./hr	None
981-G01-P	981-G01-U	Sawmill Glue Machine Exhaust Stack – Roll Applicator	Adhesive	1.94 gallons/hr	None
981-G04-P	981-G04-U	Sawmill Glue Machine Exhaust Stack - Roll Applicator	Adhesive	1.94 gallons/hr	None
981-G05-P	981-G05-U	Sawmill Glue Machine Exhaust Stack - Roll Applicator	Adhesive	1.48 gallons/hr	None

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
973-G01-P	973-G01-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	00-A-007-S4
		PM ₁₀	0.043 lb./hr ⁽³⁾	-	00-A-007-S4
		PM	0.01 gr./scf	567 IAC 23.4(13)	00-A-007-S4
		MDI	0.0043 lb./hr ⁽³⁾	-	00-A-007-S4
981-G01-P	981-G01-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM	0.01 gr./scf	567 IAC 23.4(13)	-
		VOC	39 tons/year ⁽¹⁾	-	96-A-760-S1
981-G04-P	981-G04-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM	0.01 gr./scf	567 IAC 23.4(13)	-
		VOC	39 tons/year ⁽¹⁾	-	96-A-761-S1
981-G05-P	981-G05-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM	0.01 gr./scf	567 IAC 23.4(13)	-
		VOC	39 tons/year ⁽¹⁾	-	96-A-762-S1

⁽¹⁾ This is the total emissions from 981-G01-U, 981-G04-U, and 981-G05-U.

⁽²⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (no visible emissions) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽³⁾ Standard is expressed as the average of 3 runs.

⁽⁴⁾ An exceedance of the indicator opacity of "No Visible Emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- The VOC content of any adhesive used in the process may not exceed 1.0 pounds per gallon.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The VOC content of any adhesive used in this process, in pounds per gallon.
- B. The amount of adhesive used in this source, in gallons. Calculate and record monthly and rolling 12-month totals.

Authority for Requirement: Iowa DNR Construction Permit 96-A-760-S1 (981-G01-P)
Iowa DNR Construction Permit 96-A-761-S1 (981-G04-P)
Iowa DNR Construction Permit 96-A-762-S1 (981-G05-P)

Process throughput:

- A. Rollcoater (EU 973-G01-P) is limited to 1.46 million pounds of adhesive per rolling 12-month period.
- B. The adhesive used in Rollcoater (EU 973-G01-P) shall contain a maximum of 3 percent free MDI.

Authority for Requirement: Iowa DNR Construction Permit 00-A-007-S4

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. Record on a monthly basis, the amount of adhesive used in Rollcoater (EU 973-G01-P) in pounds. Calculate and record rolling 12-month totals.
- B. Maintain MSDS of adhesive used in 982-G01-U.

Authority for Requirement: Iowa DNR Construction Permit 00-A-007-S4

NESHAP:

Emission Unit 973-G01-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products and 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts

and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
973-G01-P	00-A-007-S4	26.83	Vertical Unobstructed	8	Ambient	500 scfm
981-G01-P	96-A-760-S1	42	-	18	Ambient	3,200 scfm
981-G04-P	96-A-761-S1	42	-	18	Ambient	4,000 scfm
981-G05-P	96-A-762-S1	42	-	15 x 18	Ambient	5,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Ovens – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID
951-O03-P	951-O03-U	Vertical Paint Bake Oven Stack	Natural Gas	4.0 MMBtu/hr	None
951-O05-P	951-O05-U	Vertical Paint Bake Oven Stack	Natural Gas	1.2 MMBtu/hr	None
977-O02-P	977-O08-U	Large Part Undercoat Entrance Exhaust	Natural Gas	3.5 MMBtu/hr	None
977-O03-P	977-O04-U (served by emission points: O03, O04, and O05)	Large Part E-coat Entrance Exhaust Stack (O03)	Natural Gas	3.5 MMBtu/hr	None
977-O04-P		Large Part E-Coat Combustion/VOC Exhaust Stack (O04)	Natural Gas		None
977-O05-P		Large Part E-coat Exit Exhaust Stack (O05)	Natural Gas		None
977-O08-P		Large Part Undercoat Main Combustion/VOC Exhaust Stack	Natural Gas		None
978-O03-P	978-O03-U	Small Part Topcoat Oven Exhaust	Natural Gas	3.0 MMBtu/hr	None
978-O04-P	978-O05-U	Small Part E-Coat Secondary Combustion Exhaust	Natural Gas	4.4 MMBtu/hr	None
978-O05-P		Small Part E-Coat VOC Exhaust	E-Coat Epoxy Resins and Solvent	13.058 gallons/hr	None
979-O01-P	979-O01-U	Line 4 Cure Oven Exhaust Stack	Natural Gas	0.8 MMBtu/hr	None
990-O01-P	990-O01-U	Powder Paint Dry Off Combustion Exhaust	Natural Gas	1.0 MMBtu/hr	None
990-O03-P	990-O03-U	Powder Paint Cure Oven Combustion Exhaust	Natural Gas	4.0 MMBtu/hr	None
	990-O04-U	Powder Paint Cure Oven VOC Exhaust	Powder Paint	5.0 gallons/hr	None

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
951-O03-P	951-O03-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM	0.01 gr./scf	567 IAC 23.4(13)	88-A-102
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	-
951-O05-P	951-O05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-853
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-853
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-853
977-O02-P	977-O08-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-854
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-854
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-854

(continued)

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
977-O03-P	977-O04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-855
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-855
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-855
977-O04-P	977-O04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-855
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-855
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-855
977-O05-P	977-O04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-855
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-855
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-855
977-O08-P	977-O08-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-856
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-856
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-856
978-O03-P	978-O03-U	Opacity	40%	567 IAC 23.3(2)"d"	-
		PM	0.01 gr./scf	567 IAC 23.4(13)	85-A-099
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	-
978-O04-P	978-O05-U	Opacity	40%	567 IAC 23.3(2)"d"	⁽²⁾
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	-
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	-
978-O05-P	978-O05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	96-A-102-S1
		PM ₁₀	0.053 lb./hr	-	96-A-102-S1
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	96-A-102-S1
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	96-A-102-S1
		VOC	17.82 tons/year ⁽³⁾	-	96-A-102-S1
979-O01-P	979-O01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-096-S1
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	88-A-096-S1
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	88-A-096-S1
990-O01-P	990-O01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-858
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-858
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	00-A-858
990-O03-P	990-O03-U and 990-O04-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	96-A-1293-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	96-A-1293-S2
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	96-A-1293-S2
		VOC	16.9 tons/year	-	96-A-1293-S2

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of no visible emissions will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Iowa DNR Construction Permit 96-A-101 was issued for 978-O04-P. However, 96-A-101 does not contain any additional emission limits or operating limits.

⁽³⁾ Combined limit for EP 978-C02, EP 978-O04, and EP 978-O05. VOC emissions are limited by coating usage restrictions in the permit for the dip tank (96-A-100-S1)

⁽⁴⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. Oven 951-O05-U shall be fired by natural gas or propane only.
Authority for Requirement: Iowa DNR Construction Permit 00-A-853
2. Oven 977-O08-U shall be fired by natural gas or propane only.
Authority for Requirement: Iowa DNR Construction Permits 00-A-854 and 00-A-856
3. Oven 977-O04-U shall be fired by natural gas or propane only.
Authority for Requirement: Iowa DNR Construction Permit 00-A-855
4. Oven 979-O01-U shall be fired by natural gas or propane only.
Authority for Requirement: Iowa DNR Construction Permit 88-A-096-S1
5. Oven 990-O01-U shall be fired by natural gas or propane only.
Authority for Requirement: Iowa DNR Construction Permit 00-A-858
6. The amount of material used in 990-O03-U⁽¹⁾ shall not exceed 260,000 pounds in any rolling twelve-month period.
7. The VOC content of any material used in 990-O03-U⁽¹⁾ shall not exceed 13% by weight.
8. The 990-O03-U oven shall be fired by natural gas or LPG at a maximum heat input of 4.0 MMBTU/hr.

Authority for Requirement: Iowa DNR Construction Permit 96-A-1293-S2

⁽¹⁾ 990-O03-U is associated with the Powder Coating Operation.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. Type of fuel combusted ovens 951-O05-U, 977-O08-U, 979-O01-U, 977-O04-U, and 990-O01-U.

Authority for Requirement: 567 IAC 22.108(3)"b"

2. The permittee shall maintain the following monthly records for 990-O03-U:

- The identification of any material used in the emissions unit.
- The VOC content of any material used in the emissions unit (percent by weight).
- The total amount of material used in the emissions unit (pounds).
- The rolling 12-month total of the amount of material used in the emission unit (pounds).

Authority for Requirement: Iowa DNR Construction Permit 96-A-1293-S2

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
951-O03-P	88-A-102	-	-	-	-	-
951-O05-P	00-A-853	49.5	Vertical Unobstructed	18	210	2,900 scfm
977-O02-P	00-A-854	36	Vertical Unobstructed	34	280	10,700 scfm
977-O03-P	00-A-855	49.7	Vertical Unobstructed	18	310	2,100 scfm
977-O04-P	00-A-855	49.7	Vertical Unobstructed	18	310	2,100 scfm
977-O05-P	00-A-855	49.7	Vertical Unobstructed	18	310	2,100 scfm
977-O08-P	00-A-856	36.1	Vertical Unobstructed	8	310	688 scfm
978-O03-P	85-A-099	-	-	-	-	-
978-O04-P	96-A-101	-	-	-	-	-
978-O05-P	96-A-102-S1	33	Vertical Unobstructed	20	310	10,000 scfm
979-O01-P	88-A-096-S1	27.1	Vertical Unobstructed	16	150	1,700 scfm
990-O01-P	00-A-858	28.4	Vertical Unobstructed	12	Ambient	1,500 scfm
990-O03-P	96-A-1293-S2	33.8	Vertical Obstructed	16	425	4,200 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Cutting/Grinding/Stripping – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
973-P06-P	973-P06-U	Plastic Grinder	Plastic Beads	1400 lbs./hr	973-P06-C	Cyclone
978-P01-P	978-P01-U	Laser Cutting Machine	Sheet Steel	36 mins. of cut time/hr	None	None
978-P02-P	978-P02-U	Laser Cutting Machine	Sheet Steel	36 mins. of cut time/hr	None	None
978-P03-P	978-P03-U	Laser Cutting Machine	Sheet Steel	36 mins. of cut time/hr	None	None
978-P04-P	978-P04-U	Laser Cutting Machine	Sheet Steel	36 mins. of cut time/hr	None	None
982-P01-P	982-P01-U	Grinding Booth Exhaust	Fiberglass	0.31 lb./hr	982-P01-C	Fiberglass Filter
991-P01-P	991-P01-U	CAPCO Extrusion Line Die Strip Tank Exhaust	Caustic	8.33 lbs./hr	None	None

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
973-P06-P	973-P06-P	Opacity	40% ⁽⁵⁾	567 IAC 23.3(2)"d"	04-A-555
		PM	1.0 lb./hr	-	04-A-555
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	04-A-555
978-P01-P	978-P01-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	98-A-206
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	98-A-206
978-P02-P	978-P02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	98-A-1123
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	98-A-1123
978-P03-P	978-P03-U	Opacity	40% ⁽²⁾	567 IAC 23.3(2)"d"	99-A-408-S1
		PM ₁₀	0.6 lb./hr	-	99-A-408-S1
		PM	0.6 lb./hr	-	99-A-408-S1
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	99-A-408-S1

(continued)

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
978-P04-P	978-P04-U	Opacity	40% ⁽³⁾	567 IAC 23.3(2)"d"	00-A-641-S1
		PM ₁₀	0.082 lb./hr	-	00-A-641-S1
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	00-A-641-S1
982-P01-P	982-P01-U	Opacity	40%	567 IAC 23.3(2)"d"	96-A-090
		PM ₁₀	0.31 lb./hr	-	96-A-090
		PM ₁₀	0.1 gr./scf	-	96-A-090
		PM	0.31 lb./hr	-	96-A-090
		PM	0.1 gr./scf	567 IAC 23.3(2)"a"	96-A-090
991-P01-P	991-P01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	96-A-701-S2
		PM	0.1 gr./dscf	567 IAC 23.3(2)"a"	96-A-701-S2

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (25%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽³⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽⁴⁾ If visible emissions are observed that exceed the values obtained during the initial compliance test, a stack test may be required to further determine compliance.

⁽⁵⁾ An exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Hours of operation:

1. The hours of operation of the tooling grind operation 982-P01-U administered under DNR permit 96-A-090 shall not exceed 3,000 hours per twelve month period rolled monthly.

Authority for Requirement: Iowa DNR Construction Permit 96-A-090

Control equipment parameters:

1. All control equipment for 973-P06-P shall be maintained according to the manufacturer's specifications.

Authority for Requirement: Iowa DNR Construction Permit 04-A-555

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. The permit holder shall maintain records on the premises to show the twelve month period rolled monthly hours of operation of the tooling grind operation 982-P01-U administered under DNR permit 96-A-090.

Authority for Requirement: Iowa DNR Construction Permit 96-A-090

2. The owner or operator shall maintain a record of all inspections of the control equipment for 973-P06-P. The owner or operator shall document the results of the inspections and note any repairs that were the result of the inspections.

Authority for Requirement: Iowa DNR Construction Permit 04-A-555

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
973-P06-P	04-A-555	27	Vertical Unobstructed	8	80	3,700 scfm
978-P01-P	98-A-206	26	-	18	Ambient	3,500 scfm
978-P02-P	98-A-1123	26	-	18	Ambient	3,500 scfm
978-P03-P	99-A-408-S1	25	Vertical Unobstructed	18	70	3,500 scfm
978-P04-P	00-A-641-S1	35	Vertical Unobstructed	18	70	3,500 scfm
982-P01-P	96-A-090	18.5	-	34	70	14,150 scfm
991-P01-P	96-A-701-S2	32	Vertical Unobstructed	12	70	800 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Vertical Paint Silo – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
951-S01-P	951-S01-U	Vertical Paint Silo #1 Exhaust Stack	Paint and Thinners	15.0 gallons/hr	951-S01-C1 951-S01-C2	Dry Filters Dry Filters
951-S02-P	951-S02-U	Vertical Paint Silo #2 Exhaust Stack	Paint and Thinners	15.0 gallons/hr	951-S02-C1 951-S02-C2	Dry Filters Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
951-S01-P	951-S01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-100-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-100-S1
951-S02-P	951-S02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-101-S1
		PM	0.01 gr./scf	567 IAC 23.4(13)	88-A-101-S1

⁽¹⁾ If visible emissions are observed other than startup, shutdown, or malfunction, a stack test may be required to demonstrate compliance with the particulate standard.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- Production records shall be maintained for the tracking of pounds of production credited to OEM and the pounds of production credited to Winnebago, per twelve-month period rolled monthly. VOC emissions attributable to Winnebago business shall be calculated based on the total VOC emissions over a 12-month period and the percentage of total product produced for Winnebago.
- The OEM facility shall not be considered a support facility for Winnebago Industries as long as less than fifty percent of the OEM production is input back into the Winnebago operation.
- Adequate documentation of annual production by OEM, measured in pounds of product, shall be maintained on the premises. This documentation shall identify the product from OEM which is returned to Winnebago Industries for production, and the

product from OEM which is sold to customers for use outside the Winnebago operation.

Authority for Requirement: Iowa DNR Construction Permit 88-A-100-S1 (951-S01-P)
Iowa DNR Construction Permit 88-A-101-S1 (951-S02-P)

NESHAP:

Emission Units 951-S01-U and 951-S02-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
951-S01-P	88-A-100-S1	37 feet, 4 inches	Vertical	34	Ambient	10,600 dscfm
951-S02-P	88-A-101-S1	38 feet, 11 inches	Vertical	34	Ambient	10,600 dscfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Stack Testing:

Pollutant – Particulate Matter⁽¹⁾

1st Stack Test to be Completed by – February 24, 2007

Test Method – Iowa Compliance Sampling Manual⁽²⁾

⁽²⁾ or approved alternative

Authority for Requirement - 567 IAC 22.108(3)"b"

⁽¹⁾ **Representative Testing:** Stack testing is only required on one of these two emission points, 951-S01-P or 951-S02-P, to demonstrate compliance for both emission points. However, if the results of stack testing on the representative source exceed the emission limit(s), then both emission points shall be considered out of compliance with the emission limit(s).

⁽²⁾ or an approved alternative

The owner of this equipment or the owner's authorized agent shall provide written notice to the Director, not less than 30 days before a required stack test or performance evaluation of a continuous emission monitor. Results of the test shall be submitted in writing to the Director in the form of a comprehensive report within 6 weeks of the completion of the testing. 567 IAC 25.1(7)

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Customer Service Booths – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
970-S01-P	970-S01-U	Customer Service Dry Filter Paint Booth – West Stack	Paint and Solvents	1.027 gallons/hr	970-S01-C	Dry Filters
970-S02-P	970-S01-U	Customer Service Dry Filter Paint Booth – East Stack	Paint and Solvents	1.027 gallons/hr	970-S01-C	Dry Filters
970-S03-P	970-S03-U	Customer Service Dry Filter Adhesive Booth – North Stack	Adhesives	0.625 gallons/hr	970-S03-C	Dry Filters
970-S04-P		Customer Service Dry Filter Adhesive Booth – South Stack	Adhesives	0.625 gallons/hr	970-S03-C	Dry Filters
970-S05-P	970-S05-U	Customer Service Cabinet Bench Adhesive Spray Booth	Clearcoats and Stains	0.625 gallons/hr	970-S05-C	Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
970-S01-P	970-S01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	90-A-062-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	90-A-062-S2
		VOC	27.0 tons/year ⁽³⁾	-	90-A-062-S2
970-S02-P	970-S01-U	Opacity	40% ⁽²⁾	567 IAC 23.3(2)"d"	99-A-307-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	99-A-307-S1
		VOC	27.0 ⁽³⁾ tons/year	-	99-A-307-S1
970-S03-P	970-S03-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	02-A-038-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	02-A-038-S1
970-S04-P	970-S03-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	02-A-039-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	02-A-039-S1
970-S05-P	970-S05-U	Opacity	40% ⁽⁴⁾	567 IAC 23.3(2)"d"	02-A-040-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	02-A-040-S1

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make

corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

(3) Combined limit for EP 970-S01 and EP 970-S02.

(4) Per DNR Air Quality Policy 3-b-08, Opacity Limits, if visible emissions are observed other than start-up, shut-down, or malfunction, the owner/operator shall promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The amount of material sprayed in the Customer Service Building paint booth (EP 970-S01 and EP 970-S02) shall not exceed 9,000 gallons in any rolling twelve-month period.
- B. The VOC content of any material sprayed in the Customer Service Building paint booth (EP 970-S01 and EP 970-S02) shall not exceed 6.0 pounds per gallon, as applied.
- C. The solids content of any material sprayed in the Customer Service Building paint booth (EP 970-S01 and EP 970-S02) shall not exceed 5.4 pounds per gallon, as applied.
- D. Emission points 970-S03-P and 970-S04-P are subject to the following:
 - 1. The solids content of the as-sprayed material is limited to 1.90 pounds per gallon.
 - 2. The VOC content of the as-sprayed material is limited to 5.50 pounds per gallon.
 - 3. The Adhesive Application Spray Booth consisting of emission points 970-S03-P and 970-S04-P is limited to 1,800 gallons per rolling 12-month period as-sprayed for paint and solvent usage.
 - 4. This paint booth is limited to the spraying or operation of one paint gun at any time.
 - 5. This paint booth shall spray no more than ten (10) gallons of paint and solvents as sprayed per 24 hour period. If more than ten (10) gallons of paint and solvent as sprayed per 24 hour period occurs, the facility shall do stack testing on both stacks simultaneously.
- E. Emission point 970-S05-P is subject to the following:
 - 1. The solids content of the as-sprayed material is limited to 2.30 pounds per gallon.
 - 2. The VOC content of the as-sprayed material is limited to 6.70 pounds per gallon.
 - 3. The Customer Service Cabinet Bench Booth consisting of emission point 970-S05-P is limited to 1800 gallons per rolling 12-month period as-sprayed for paint and solvent usage.
 - 4. This paint booth is limited to the spraying or operation of one (1) paint gun at any time.
 - 5. This paint booth shall spray no more than ten (10) gallons of paint and solvents as sprayed per 24 hour period. If more than ten (10) gallons of paint and solvent as sprayed per 24 hour period occurs, the facility shall do stack testing.

Control equipment parameters:

- A. The permittee shall maintain the paint booth's (EP 970-S01 and EP 970-S02) filters according to the manufacturer's specifications and maintenance schedule.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any material used in the spray booth (EP 970-S01 and EP 970-S02).
- B. The as-applied VOC content and the as-applied solids content of any material used in the booth (lbs/gal) (EP 970-S01 and EP 970-S02).
- C. The total amount of material used in the spray booth (gallons) (EP 970-S01 and EP 970-S02).
- D. The rolling 12-month total of the amount of material used in the spray booth (gallons) (EP 970-S01 and EP 970-S02).
- E. Any maintenance done on the booth's (EP 970-S01 and EP 970-S02) filters.
- F. Retain Material Safety Data Sheets (MSDS) of all paints and solvents used in the Adhesive Application Spray Booth (EP 970-S03-P, 970-S04-P, and 970-S05-P).
- G. Record the quantity of paint and solvent used in a rolling 12-month period (EP 970-S03-P, 970-S04-P, and 970-S05-P).
- H. Maintain records documenting maintenance of control equipment (EP 970-S03-P, 970-S04-P, and 970-S05-P).

Note, the Department has discussed the method of tracking paint and solvent usage with Winnebago. Winnebago uses an inventory database that records the amount of paint and solvent issued to the Adhesive Application Spray Booth production area (EP 970-S03-P, 970-S04-P, and 970-S05-P), amount of waste material shipped off-site, and then Winnebago uses these numbers to determine the emissions from the paint booth. The Department has determined that this method is acceptable.

Authority for Requirement: Iowa DNR Construction Permit 90-A-062-S2 (970-S01-P)
Iowa DNR Construction Permit 99-A-307-S1 (970-S02-P)
Iowa DNR Construction Permit 02-A-038-S1 (970-S03-P)
Iowa DNR Construction Permit 02-A-039-S1 (970-S04-P)
Iowa DNR Construction Permit 02-A-040-S1 (970-S05-P)

NESHAP:

Emission Unit 970-S01-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to p. 12 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 90-A-062-S2 (970-S01-P)
Iowa DNR Construction Permit 99-A-307-S1 (970-S02-P)
567 IAC 23.1(4)

Emission Unit 970-S01-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Unit 970-S05-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart JJ, Wood Furniture Manufacturing Operations. Please refer to p. 16 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
970-S01-P	90-A-062-S2	29	Vertical Unobstructed	42	70	19,440 scfm
970-S02-P	99-A-307-S1	29	Vertical Unobstructed	42	70	19,440 scfm
970-S03-P	02-A-038-S1	27	Vertical Unobstructed	24	Ambient	7,400 scfm
970-S04-P	02-A-039-S1	27	Vertical Unobstructed	24	Ambient	7,400 scfm
970-S05-P	02-A-040-S1	24	Vertical Unobstructed	18	Ambient	4,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

<u>Spray Booth Filter Agency Operation & Maintenance Plan</u>
Weekly Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.
Record Keeping and Reporting Maintenance and inspection records will be kept for five years and be available upon request.
Quality Control The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Van Conversion Paint Line – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
973-S01-P	973-S01-U	Van Conversion Dry Filter Paint Booth	Paint and Solvents	1.05 gallons/hr	973-S01-C	Dry Filters
973-S02-P	973-S02-U	Van Conversion Dry Filter Paint Booth	Paint and Solvents	1.05 gallons/hr	973-S02-C	Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
973-S01-P	973-S01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	92-A-657-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	92-A-657-S3
		VOC	27.6 tons/year ⁽²⁾	-	92-A-657-S3
973-S02-P	973-S02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	92-A-658-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	92-A-658-S3
		VOC	27.6 tons/year ⁽²⁾	-	92-A-658-S3

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Combined limit for EP 973-S01 and 973-S02.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- The amount of material sprayed in the two Van Shop paint booths (EP 973-S01 and EP 973-S02) shall not exceed 9200 gallons in any rolling twelve-month period.
- The VOC content of any material sprayed in the two Van Shop paint booths (EP 973-S01 and EP 973-S02) shall not exceed 6.0 pounds per gallon, as applied.

Control equipment parameters:

- The permittee shall maintain the paint booth's filters according to the manufacturer's specifications and maintenance schedule.

Hours of operation:

A. This emissions unit may be used only between the hours of 6 AM and 6 PM.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

A. The permittee shall maintain the following monthly records:

- The identification of any material used in the two Van Shop spray booths (EP 973-S01 and EP 973-S02).
- The VOC content of any material used in the two Van Shop spray booths (lbs./gal).
- The total amount of material used in the two Van Shop spray booths (gallons).
- The rolling 12-month total of the amount of material used in the two Van Shop spray booths (gallons).
- Any maintenance done on the booth's filters.

B. The permittee shall record daily the hours when operation of the spray booth begins and ends.

Authority for Requirement: Iowa DNR Construction Permit 92-A-657-S3 (973-S01-P)
Iowa DNR Construction Permit 92-A-658-S3 (973-S02-P)

NESHAP:

Emission Units 973-S01-U and 973-S02-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to p. 12 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 92-A-657-S3 (973-S01-P)
Iowa DNR Construction Permit 92-A-658-S3 (973-S02-P)
567 IAC 23.1(4)

Emission Units 973-S01-U and 973-S02-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
973-S01-P	92-A-657-S3	30	Vertical Unobstructed	42	70	17,500 scfm
973-S02-P	92-A-658-S3	30	Vertical Unobstructed	42	70	17,500 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Van Shop Surface Preparation – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
973-S03-P	973-S03-U	Van Shop Surface Preparation Booth	Motorhomes	4.0 Motorhomes/hr	973-S03-C	Fiberglass Filter
973-S05-P	973-S05-U	Van Shop Surface Preparation Booth	Motorhomes	4.0 Motorhomes/hr	973-S05-C	Fiberglass Filter

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
973-S03-P	973-S03-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	96-A-086-S2
		PM ₁₀	0.85 lb./hr	-	96-A-086-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	96-A-086-S2
973-S05-P	973-S05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	96-A-088-S2
		PM ₁₀	0.85 lb./hr	-	96-A-088-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	96-A-088-S2

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Control equipment:

- A. The control equipment shall be inspected and maintained according to manufacturer's recommendations.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The owner or operator shall keep records of control equipment inspections and maintenance.

Authority for Requirement: Iowa DNR Construction Permit 96-A-086-S2 (973-S03-P)
Iowa DNR Construction Permit 96-A-088-S2 (973-S05-P)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
973-S03-P	96-A-086-S2	31.5	Vertical Unobstructed	34	Ambient	17,000 scfm
973-S05-P	96-A-088-S2	29.5	Vertical Unobstructed	34	Ambient	17,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility operation and maintenance plans must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the applicable requirements.

Facility operation and maintenance plans are to be developed by the facility within six(6) months of the issuance date of this permit and the data pertaining to the plan maintained on site for at least 5 years. The plan and associated recordkeeping provides documentation of this facility's implementation of its obligation to operate according to good air pollution control practice.

Good air pollution control practice is achieved by adoption of quality control standards in the operation and maintenance procedures for air pollution control that are comparable to industry quality control standards for the production processes associated with this emission point.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Small Parts Topcoat Paint Line – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
977-S05-P	977-S05-U	#1 Small Parts Topcoat Paint Booth Stack	Paints and Solvents	3.33 gallons/hr	977-S05-C1 977-S05-C2	Dry Paint Filters: Stage-1 Filter & Stage-2 Pocket Filter
977-S06-P	977-S06-U	#2 Small Parts Topcoat Paint Booth Stack	Paints and Solvents	3.33 gallons/hr	977-S06-C1 977-S06-C2	Dry Paint Filters: Stage-1 Filter and Stage-2 Pocket Filter

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
977-S05-P	977-S05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-097-S2
		PM ₁₀	0.414 lb./hr	-	88-A-097-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-097-S2
		VOC	22.0 tons/year ⁽²⁾	-	88-A-097-S2
977-S06-P	977-S06-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-098-S2
		PM ₁₀	0.414 lb./hr	-	88-A-098-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-098-S2
		VOC	22.0 tons/year ⁽²⁾	-	88-A-098-S2

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Combined limit for EP 977-S05 and 977-S06.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The amount of material sprayed in the Small Parts Topcoat spray booth #1 and the Small Parts Topcoat spray booth #2 (EP 977-S05 and EP 977-S06) shall not exceed 12,800 gallons in any rolling twelve-month period.

- B. The VOC content of any material sprayed in the Small Parts Topcoat spray booth #1 and the Small Parts Topcoat spray booth #2 shall not exceed 3.43 pounds per gallon, as applied.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

- A. The identification of any material used in the spray booth.
- B. The VOC content of any material used in the booth (lbs/gal).
- C. The total amount of material used in the Small Parts Topcoat spray booth #1 and the Small Parts Topcoat spray booth #2 (gallons).
- D. The rolling 12-month total of the amount of material used in the Small Parts Topcoat spray booth #1 and the Small Parts Topcoat spray booth #2 (gallons).

Authority for Requirement: Iowa DNR Construction Permit 88-A-097-S2 (977-S05-P)
Iowa DNR Construction Permit 88-A-098-S2 (977-S06-P)

NESHAP:

Emission Units 977-S05-U and 977-S06-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 88-A-097-S2 (977-S05-P)
Iowa DNR Construction Permit 88-A-098-S2 (977-S06-P)
567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
977-S05-P	88-A-097-S2	40	Vertical Unobstructed	48	70	21,000 scfm
977-S06-P	88-A-098-S2	40	Vertical Unobstructed	48	70	21,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Line 4 Paint Line – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
979-S01-P	979-S01-U	Line 4 Basecoat Spray Booth #1, W. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S01-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S02-P	979-S01-U	Line 4 Basecoat Spray Booth #1, E. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S01-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S03-P	979-S03-U	Line 4 Basecoat Spray Booth #2, W. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S03-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S04-P	979-S03-U	Line 4 Basecoat Spray Booth #2, E. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S03-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S05-P	979-S05-U	Line 4 Clearcoat Spray Booth, W. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S05-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S06-P	979-S05-U	Line 4 Clearcoat Spray Booth, E. Stack (includes Air Make-up Heater)	Basecoats, Topcoats, and Solvents	(1)	979-S05-C	Dry Filters
			Natural Gas	4.86 MMBtu/hr		
979-S10-P	979-S10-U	Line 4 Touch-up Spray Booth, W. Stack	Basecoats, Topcoats, and Solvents	(1)	979-S10-C	Dry Filters
979-S11-P		Line 4 Touch-up Spray Booth, E. Stack	Basecoats, Topcoats, and Solvents	(1)	979-S10-C	Dry Filters

⁽¹⁾ The Line 4 Paint Line, consisting of the emission sources listed in Table G1g, is limited to 22,300 gallons per rolling 12-month period as sprayed for paint and solvent usage, or approx. 2.55 gallons/hr total.

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
979-S01-P	979-S01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-093-S3
		PM ₁₀	0.39 lb./hr	-	88-A-093-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-093-S3
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	88-A-093-S3
		VOC	39.4 tpy ⁽²⁾	-	88-A-093-S3

(continued)

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
979-S02-P	979-S01-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-094-S7
		PM ₁₀	0.39 lb./hr	-	88-A-094-S7
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-094-S7
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	88-A-094-S7
		VOC	39.4 tpy ⁽²⁾	-	88-A-094-S7
979-S03-P	979-S03-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	88-A-095-S3
		PM ₁₀	0.39 lb./hr	-	88-A-095-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	88-A-095-S3
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	88-A-095-S3
		VOC	39.4 tpy ⁽²⁾	-	88-A-095-S3
979-S04-U	979-S03-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	89-A-048-S3
		PM ₁₀	0.39 lb./hr	-	89-A-048-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	89-A-048-S3
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	89-A-048-S3
		VOC	39.4 tpy ⁽²⁾	-	89-A-048-S3
979-S05-P	979-S05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	96-A-103-S2
		PM ₁₀	0.39 lb./hr	-	96-A-103-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	96-A-103-S2
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	96-A-103-S2
		VOC	39.4 tpy ⁽²⁾	-	96-A-103-S2
979-S06-P	979-S05-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1271-S1
		PM ₁₀	0.39 lb./hr	-	01-A-1271-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1271-S1
		SO ₂	500 ppmv	567 IAC 23.3(3)"e"	01-A-1271-S1
		VOC	39.4 tpy ⁽²⁾	-	01-A-1271-S1
979-S10-P	979-S10-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-600-S3
		PM ₁₀	0.13 lb./hr	-	00-A-600-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	00-A-600-S3
		VOC	39.4 tpy ⁽²⁾	-	00-A-600-S3
979-S11-P	979-S10-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	01-A-1272
		PM ₁₀	0.13 lb./hr	-	01-A-1272
		PM	0.01 gr./dscf	567 IAC 23.4(13)	01-A-1272
		VOC	39.4 tpy ⁽²⁾	-	01-A-1272

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, if visible emissions are observed other than start-up, shut-down, or malfunction, the owner/operator shall promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ The bubble limit is 39.4 tpy for VOC for the emission points of 979-S01-P, 979-S02-P, 979-S03-P, 979-S04-P, 979-S05-P, 979-S06-P, 979-S10-P, and 979-S11-P. The 39.4 tpy also takes into account the approximate 4.86 MMBtu/hr direct fired heating units for three of the paint booths. 39.03 tpy of the 39.4 tpy limit is for paint and solvent usage.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. The solids content of the as-sprayed material is limited to 6.1 pounds per gallon.
2. The VOC content of the as-sprayed material is limited to 3.5 pounds per gallon.
3. The Line 4 Paint Line consisting of emission points 979-S01-P, 979-S02-P, 979-S03-P, 979-S04-P, 979-S05-P, 979-S06-P, 979-S10-P, and 979-S11-P is limited to a rolling 12-month limit of 39.4 tpy of VOC emissions that consist of three direct fired heaters and the painting operations.
4. Of the 39.4 tpy VOC emissions, the Line 4 Paint Line is limited to 39.03 tpy or 22,300 gallons per rolling 12-month period as sprayed for paint and solvent usage.
5. This paint booth is limited to the spraying or operation of 2 paint guns or less at any time.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. Retain Material Safety Data Sheets (MSDS) of all paints and solvents used in the Line 4 Paint Line.
2. Record the quantity of paint and solvent used in a rolling 12-month period.
3. Tabulate the VOC emissions based on each VOC content and paint usage based on a twelve (12) month rolling period, rolled monthly.
4. Maintain records documenting maintenance of control equipment.

Note, the Department has discussed the method of tracking paint and solvent usage with Winnebago. Winnebago uses an inventory database which records the amount of paint and solvent issued to the Line 4 production area, amount of waste material shipped off-site, and then Winnebago uses these numbers to determine the emissions from the paint booth. The Department has determined that this method is acceptable for accounting the VOC emission to show the limit of 39.03 tpy is maintained.

Authority for Requirement: Iowa DNR Construction Permit 88-A-093-S3 (EP 979-S01-P)
Iowa DNR Construction Permit 88-A-094-S7 (EP 979-S02-P)
Iowa DNR Construction Permit 88-A-095-S3 (EP 979-S03-P)
Iowa DNR Construction Permit 89-A-048-S3 (EP 979-S04-P)
Iowa DNR Construction Permit 96-A-103-S2 (EP 979-S05-P)
Iowa DNR Construction Permit 01-A-1271-S1 (EP 979-S06-P)
Iowa DNR Construction Permit 00-A-600-S3 (EP 979-S10-P)
Iowa DNR Construction Permit 01-A-1272 (EP 979-S11-P)

NESHAP:

Emission Units 979-S01-U, 979-S03-U, 979-S05-U, and 979-S10-U are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products and 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
979-S01-P	88-A-093-S3	30	Vertical Unobstructed	36	Ambient	22,500 scfm
979-S02-P	88-A-094-S7	30	Vertical Unobstructed	36	Ambient	22,500 scfm
979-S03-P	88-A-095-S3	30	Vertical Unobstructed	36	Ambient	20,000 scfm
979-S04-P	89-A-048-S3	30	Vertical Unobstructed	36	Ambient	20,000 scfm
979-S05-P	96-A-103-S2	30	Vertical Unobstructed	36	Ambient	22,500 scfm
979-S06-P	01-A-1271-S1	30	Vertical Unobstructed	36	Ambient	22,500 scfm
979-S10-P	00-A-600-S3	30	Vertical Unobstructed	42	Ambient	21,000 scfm
979-S11-P	01-A-1272	30	Vertical Unobstructed	42	Ambient	21,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

<p style="text-align: center;"><u>Spray Booth Filter Agency Operation & Maintenance Plan</u></p> <p>Weekly Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.</p> <p>Record Keeping and Reporting Maintenance and inspection records will be kept for five years and be available upon request.</p> <p>Quality Control The filter equipment will be operated and maintained according to the manufacturer's recommendations.</p>
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Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Off-line Touch-up Spray Booth – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
979-S08-P	979-S08-U	Off-line Touch-up Spray Booth, E. Stack	Paints and Solvents	1.825 gallons/hr	979-S08-C	Dry Filters
979-S09-P		Off-line Touch-up Spray Booth, W. Stack	Paints and Solvents	1.825 gallons/hr	979-S08-C	Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
979-S08-P	979-S08-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	94-A-251-S2
		PM ₁₀	0.338 lb./hr	-	94-A-251-S2
		PM	0.338 lb./hr	-	94-A-251-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	94-A-251-S2
		VOC	18.33 tons/year ⁽²⁾	-	94-A-251-S2
979-S09-P	979-S08-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	03-A-1072
		PM ₁₀	0.338 lb./hr	-	03-A-1072
		PM	0.338 lb./hr	-	03-A-1072
		PM	0.01 gr./dscf	567 IAC 23.4(13)	03-A-1072
		VOC	18.33 tons/year ⁽²⁾	-	03-A-1072

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total for 979-S08-P and 979-S09-P.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- The amount of material sprayed in the Line #4 Touchup spray booth (EP 979-S08 and 979-S09) shall not exceed 5,500 gallons in any twelve-month period.
- The VOC content of any material sprayed in the Line #4 Touchup spray booth (EP 979-S08 and 979-S09) shall not exceed 6.6 pounds per gallon, as applied.
- Only one spray gun shall be operated in the spray booth at any time.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any material used in the spray booth.
- B. The as applied VOC content of any material used in the booth (lbs/gal).
- C. The total amount of material used in the spray booth (gallons).
- D. The rolling 12-month total of the amount of material used in the spray booth (gallons)
- E. Any maintenance done on the booth's filters.

Authority for Requirement: Iowa DNR Construction Permit 94-A-251-S2 (979-S08-P)
Iowa DNR Construction Permit 03-A-1072 (979-S09-P)

NESHAP:

Emission Unit 979-S08-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to p. 12 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 94-A-251-S2 (979-S08-P)
Iowa DNR Construction Permit 03-A-1072 (979-S09-P)
567 IAC 23.1(4)

Emission Unit 979-S08-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

		Stack Characteristics				
EP	Construction Permit #	Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
979-S08-P	94-A-251-S2	28	Vertical Unobstructed	42	70	19,440 scfm
979-S09-P	03-A-1072	28	Vertical Unobstructed	42	70	19,440 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 982-S07-P

Associated Equipment

Associated Emission Unit ID Numbers: 982-S07-U

Emissions Control Equipment ID Number: 982-S07-C

Emissions Control Equipment Description: Fiberglass Filter

Applicable Requirements

Emission Unit vented through this Emission Point: 982-S07-U

Emission Unit Description: R & D Spray Booth

Raw Material/Fuel: Paints and Thinners

Rated Capacity: 0.628 gallons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of ("No Visible emissions") will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: Iowa DNR Construction Permit 77-A-213-S3
567 IAC 23.3(2)"d"

Pollutant: PM₁₀

Emission Limit(s): 0.39 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 77-A-213-S3

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr./scf

Authority for Requirement: Iowa DNR Construction Permit 77-A-213-S3
567 IAC 23.4(13)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

1. The amount of paints and solvents used in this paint booth shall not exceed 5500 gallons per rolling twelve-month period.

2. The VOC content shall not exceed 6.5 pounds per gallon for all paints and solvents used in this paint booth.
3. The Solids content shall not exceed 5.4 pounds per gallon for all paints and solvents used in this paint booth.

Control equipment parameters:

1. Maintain dry filters according to manufacturers specifications and maintenance schedule.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner.

1. Calculate and record monthly and rolling twelve-month totals.
2. Record the VOC content and product codes of all paints and solvents used in this booth, in pounds per gallon.
3. Record the solids content and product codes of all paints and solvents used in this booth, in pounds per gallon.
4. Retain MSDS sheets of all paints and solvents used this booth
5. Record on a monthly basis, all maintenance of dry filters

Authority for Requirement: Iowa DNR Construction Permit 77-A-213-S3

NESHAP:

Emission Unit 982-S07-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Parts and Products and 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 26.5

Stack Diameter (inches): 34

Stack Exhaust Flow Rate (scfm): 16,040

Stack Temperature (°F): Ambient

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 77-A-213-S3

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

<u>Spray Booth Filter Agency Operation & Maintenance Plan</u>
Weekly Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material. Maintain a written record of the observation and any action resulting from the inspection.
Record Keeping and Reporting Maintenance and inspection records will be kept for five years and be available upon request.
Quality Control The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 982-S08-P

Associated Equipment

Associated Emission Unit ID Numbers: 982-S08-U

Emissions Control Equipment ID Number: 982-S08-C

Emissions Control Equipment Description: Dry Filters

Applicable Requirements

Emission Unit vented through this Emission Point: 982-S08-U

Emission Unit Description: Tooling Resin Spray Booth

Raw Material/Fuel: Fiberglass Gelcoats and Polyester Resins

Rated Capacity: 7.5 gallons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

⁽¹⁾ An exceedance of the indicator opacity of “no visible emissions” will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2
567 IAC 23.3(2)"d"

Pollutant: PM₁₀

Emission Limit(s): 0.40 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2
567 IAC 23.4(13)

Pollutant: Particulate Matter

Emission Limit(s): 0.40 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 8.6 tons/year

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. This emissions unit shall comply with all applicable requirements from 40 CFR Part 63, Subpart WWWW, NESHAP for Reinforced Plastic Composites Production by April 21, 2006.
- B. Emissions of VOC and organic HAP⁽¹⁾ for mechanical tooling resin application shall not exceed 254 lbs per ton of material used.
- C. Until April 20, 2006, emissions of VOC and organic HAP for tooling gel coat application shall not exceed 626 lbs per ton of material used.
- D. After April 20, 2006, emissions of VOC and organic HAP for tooling gel coat application shall not exceed 440 lbs per ton of material used.
- E. Until April 20, 2006, the amount of resin and gel coat used in this emissions unit shall not exceed 54,952 pounds in any rolling 12-month period.
- F. After April 20, 2006, the amount of resin and gel coat used in this emissions unit shall not exceed 78,181 pounds in any rolling 12-month period.
- G. The VOC and the organic HAP content of any tooling resin applied by nonatomized application shall not exceed 91.4% by weight.
- H. The VOC and the organic HAP content of any tooling resin applied by atomized application shall not exceed 43% by weight.
- I. Until April 20, 2006, the VOC and the organic HAP content of any tooling gel coat shall not exceed 49.0% by weight.
- J. After April 20, 2006, the VOC and the organic HAP content of any tooling gel coat shall not exceed 40.0% by weight.

⁽¹⁾ Hazardous Air Pollutant as defined by 112(b) of the Clean Air Act. For a list of HAPs, please refer to Table A which is part of the Air Construction Permit Application or contact the Iowa DNR - Air Quality Bureau.

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

Work practice standards:

- A. Manual grinding of formed parts is permitted in the booth.

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any material used in the Tooling Room Spray Booth.
- B. The VOC and the organic HAP content of any material used in the Tooling Room Spray Booth.
- C. The amount of resin and gel coat used in the Tooling Room Spray Booth (pounds).
- D. The rolling 12-month total of the amount of resin and gel coat used in the Tooling Room Spray Booth (pounds).

- E. The VOC and the organic HAP emission rate (tons). The emissions from mechanical resin and spray gel coat application shall be determined by using the appropriate equations from Table 1 of 40 CFR Part 63, Subpart WWWW, National Emissions Standard for Hazardous Air Pollutants: Reinforced Plastic Composite Production. These equations are used to calculate organic HAP emissions from open molding operations. The emissions of VOC shall be considered equivalent to organic HAP emissions provided that all the VOC components in the resin and gel coat are organic HAPs. If a VOC component is not an organic HAP, the permittee shall estimate that 100% of the VOC component is emitted in the Tooling Room Spray Booth.
- F. The rolling 12-month total of the VOC and the organic HAP emissions (tons).

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

NESHAP:

This emission unit is located at a reinforced plastic composites production facility, which is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart WWWW, Reinforced Plastic Composites Production. Please refer to p. 12 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2
567 IAC 23.1(4)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 18.5

Stack Diameter (inches): 34

Stack Exhaust Flow Rate (scfm): 14,150

Stack Temperature (°F): 70

Discharge Style: Horizontal

Authority for Requirement: Iowa DNR Construction Permit 96-A-092-S2

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 982-S09-P

Associated Equipment

Associated Emission Unit ID Numbers: 982-S09-U

Emissions Control Equipment ID Number: 982-S09-C

Emissions Control Equipment Description: Dry Filters

Applicable Requirements

Emission Unit vented through this Emission Point: 982-S09-U

Emission Unit Description: Touch-up Spray Booth

Raw Material/Fuel: Stains and Solvents

Rated Capacity: 18.75 gallons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of (10%) will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If the exceedance continues after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: Iowa DNR Construction Permit 04-A-195
567 IAC 23.3(2)"d"

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 04-A-195
567 IAC 23.4(13)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. Material usage shall not exceed 750 gallons per twelve-month rolling period.
- B. VOC content of any material used shall not exceed 8.0 pounds per gallon.

Authority for Requirement: Iowa DNR Construction Permit 04-A-195

Control equipment parameters:

- A. The filters shall be operated and maintained per the manufacturer's instructions and specifications.

Authority for Requirement: Iowa DNR Construction Permit 04-A-195

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. Record material usage per twelve-month rolling period.
- B. Maintain the MSDS for all materials used.
- C. Maintain a record of all maintenance and replacement of the filters.

Authority for Requirement: Iowa DNR Construction Permit 04-A-195

NESHAP:

This emission unit is located at a reinforced plastic composites production facility, which is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart JJ, Wood Furniture Manufacturing Operations. Please refer to p. 16 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 04-A-195
567 IAC 23.1(4)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 27

Stack Diameter (inches): 24

Stack Exhaust Flow Rate (scfm): 7,000

Stack Temperature (°F): Ambient

Discharge Style: Vertical

Authority for Requirement: Iowa DNR Construction Permit 04-A-195

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan**Weekly**

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 987-S01-P

Associated Equipment

Associated Emission Unit ID Numbers: 987-S01-U
Emissions Control Equipment ID Number: 987-S01-C
Emissions Control Equipment Description: Dry Filters

Applicable Requirements

Emission Unit vented through this Emission Point: 987-S01-U
Emission Unit Description: Maintenance Dry Filter Spray Booth
Raw Material/Fuel: Paint and Solvents
Rated Capacity: 1.25 gallons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%⁽¹⁾

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedance of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedance. The permit holder shall also file an "indicator opacity exceedance report" with the DNR field office and keep records as required in the policy. If exceedances continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1
567 IAC 23.3(2)"d"

Pollutant: PM₁₀

Emission Limit(s): 0.50 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1

Pollutant: Particulate Matter

Emission Limit(s): 0.01 gr./dscf

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1
567 IAC 23.4(13)

Pollutant: Particulate Matter

Emission Limit(s): 0.50 lb./hr

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 7.8 tons/year

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The amount of coatings used in the Maintenance Paint Spray Booth shall not exceed 2,500 gallons in any rolling twelve-month period.
- B. The VOC content of any coating used in the Maintenance Paint Spray Booth shall not exceed 6.24 pounds of VOC per gallon.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any coating used in the Maintenance Paint Spray Booth.
- B. The VOC content of any coating used in the Maintenance Paint Spray Booth.
- C. The amount of coating used in the Maintenance Paint Spray Booth (gallons).
- D. The rolling 12-month total of the amount of coating used in the Maintenance Paint Spray Booth (gallons).

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 26.5

Stack Diameter (inches): 42

Stack Exhaust Flow Rate (scfm): 25,600

Stack Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 96-A-089-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Full Body Paint Line – See Table Below.

Associated Equipment

EP	EU	EU Description	Raw Material/ Fuel	Rated Capacity	CE ID	CE Description
987-S02-P	987-S02-U	Full Body Paint – Basecoat Spray Booth	Paint and Solvents	1.27 gallons/hr	987-S02-C	Dry Filters
987-S03-P	987-S02-U	Full Body Paint – Basecoat Spray Booth	Paint and Solvents	1.27 gallons/hr	979-S02-C	Dry Filters
987-S04-P	987-S04-U	Full Body Paint – Clearcoat Spray Booth	Paint and Solvents	1.25 gallons/hr	987-S04-C	Dry Filters
987-S05-P	987-S04-U	Full Body Paint – Clearcoat Spray Booth	Paint and Solvents	1.25 gallons/hr	979-S04-C	Dry Filters

Applicable Requirements

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from the emission points listed in the table below shall not exceed the levels specified below.

EP	EU	Pollutant	Emission Limit	Authority for Requirement	
				IAC	Iowa DNR Construction Permit
987-S02-P	987-S02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	98-A-211-S2
		PM ₁₀	0.50 lb./hr	-	98-A-211-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	98-A-211-S2
		VOC	36.0 tpy ⁽²⁾	-	98-A-211-S2
987-S03-P	987-S02-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-601-S1
		PM ₁₀	0.50 lb./hr	-	00-A-601-S1
		PM	0.01 gr./dscf	567 IAC 23.4(13)	00-A-601-S1
		VOC	36.0 tpy ⁽²⁾	-	00-A-601-S1
987-S04-P	987-S04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	98-A-212-S3
		PM ₁₀	0.50 lb./hr	-	98-A-212-S3
		PM	0.01 gr./dscf	567 IAC 23.4(13)	98-A-212-S3
		VOC	28.8 tpy ⁽³⁾	-	98-A-212-S3
987-S05-P	987-S04-U	Opacity	40% ⁽¹⁾	567 IAC 23.3(2)"d"	00-A-602-S2
		PM ₁₀	0.50 lb./hr	-	00-A-602-S2
		PM	0.01 gr./dscf	567 IAC 23.4(13)	00-A-602-S2
		VOC	28.8 tpy ⁽³⁾	-	00-A-602-S2

⁽¹⁾ Per DNR Air Quality Policy 3-b-08, Opacity Limits, an exceedence of the indicator opacity of "no visible emissions" will require the owner/operator to promptly investigate the emission unit and make corrections to operations or equipment associated with the exceedence. The permit holder shall also file an "indicator opacity exceedence report" with the DNR field office and keep records as required in the policy. If exceedences continue after the corrections, the DNR may require additional proof to demonstrate compliance (e.g., stack testing).

⁽²⁾ Total emissions from EP 987-S02-P and EP 987-S03-P.

⁽³⁾ Total emissions from EP 987-S04-P and EP 987-S05-P.

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The amount of material sprayed in the Full Body basecoat spray booth (EP 987-S02 and EP 987-S03) shall not exceed 10,827 gallons in any rolling twelve-month period.
- B. The VOC content of any material sprayed in the Full Body basecoat spray booth (EP 987-S02 and EP 987-S03) shall not exceed 6.65 pounds per gallon, as applied.
- C. The solids content of any material sprayed in the Full Body basecoat spray booth (EP 987-S02 and EP 987-S03) shall not exceed 6.5 pounds per gallon, as applied.

Authority for Requirement: Iowa DNR Construction Permit 98-A-211-S2 (987-S02-P)
Iowa DNR Construction Permit 00-A-601-S1 (987-S03-P)

- D. The amount of material sprayed in the Full Body clearcoat spray booth (EP 987-S04 and EP 987-S05) shall not exceed 9,142 gallons in any rolling twelve-month period.
- E. The VOC content of any material sprayed in the Full Body clearcoat spray booth (EP 987-S04 and EP 987-S05) shall not exceed 6.3 pounds per gallon, as applied.
- F. The solids content of any material sprayed in the Full Body clearcoat spray booth (EP 987-S04 and EP 987-S05) shall not exceed 6.0 pounds per gallon, as applied.

Authority for Requirement: Iowa DNR Construction Permit 98-A-212-S3 (987-S04-P)
Iowa DNR Construction Permit 00-A-602-S2 (987-S05-P)

Control equipment parameters:

The permittee shall maintain the paint booth's filters according to the manufacturer's specifications and maintenance schedule.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any material used in the spray booth.
- B. The as-applied VOC content and the as-applied solids content of any material used in the booth (lbs./gal).
- C. The total amount of material used in the spray booth (gallons).
- D. The rolling 12-month total of the amount of material used in the spray booth (gallons).
- E. Any maintenance done on the booth's filters. In addition, permittee shall record when the filters are changed.

Authority for Requirement: Iowa DNR Construction Permit 98-A-211-S2 (987-S02-P)
Iowa DNR Construction Permit 00-A-601-S1 (987-S03-P)
Iowa DNR Construction Permit 98-A-212-S3 (987-S04-P)
Iowa DNR Construction Permit 00-A-602-S2 (987-S05-P)

NESHAP:

Emission Unit 987-S02-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart M, Surface Coating of Miscellaneous Parts. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 98-A-211-S2 (987-S02-P)
Iowa DNR Construction Permit 00-A-601-S1 (987-S03-P)
567 IAC 23.1(4)

Emission Unit 987-S02-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to p. 12 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: 567 IAC 23.1(4)

Emission Unit 987-S04-U is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart MMMM, Surface Coating of Miscellaneous Parts and Products and 40 CFR, Part 63, Subpart PPPP, Surface Coating of Plastic Parts and Products. Please refer to pages 12 and 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 98-A-212-S3 (987-S04-P)
Iowa DNR Construction Permit 00-A-602-S2 (987-S05-P)
567 IAC 23.1(4)

Emission Point Characteristics

The emission points listed in the table below shall conform to the specifications listed below.

EP	Construction Permit #	Stack Characteristics				
		Stack Height (feet from the ground)	Discharge Style	Stack Opening (inches, dia)	Exhaust Temp. (°F)	Exhaust Flowrate
987-S02-P	98-A-211-S2	28.2	Vertical Unobstructed	42	70	21,000 scfm
987-S03-P	00-A-601-S1	28.2	Vertical Unobstructed	42	70	21,000 scfm
987-S04-P	98-A-212-S3	28.2	Vertical Unobstructed	42	70	21,000 scfm
987-S05-P	00-A-602-S2	28.2	Vertical Unobstructed	42	70	21,000 scfm

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☒ No ☐

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Spray Booth Filter Agency Operation & Maintenance Plan

Weekly

Inspect the spray booth system for conditions that reduce the operating efficiency of the collection system. This will include a visual inspection of the condition of the filter material.

Maintain a written record of the observation and any action resulting from the inspection.

Record Keeping and Reporting

Maintenance and inspection records will be kept for five years and be available upon request.

Quality Control

The filter equipment will be operated and maintained according to the manufacturer's recommendations.

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID: Vehicle Exhausts – See Table Below.

Associated Equipment

Emission Point Number	Emission Unit Number	Emission Unit Description	Raw Material	Rated Capacity	Control Equipment Number
979-V01-P	979-V01-U	Motor Home Plant Alignment Pit Vehicle Exhaust	Motor Home Units Produced and Diesel Fuel	2.5 units/hr and 6.058 gallons/hr	None
979-V02-P	979-V02-U	Motor Home Plant Road Test Vehicle Exhaust	Motor Home Units Produced and Diesel Fuel	2.5 units/hr and 6.058 gallons/hr	None
979-V03-P	979-V03-U	Motor Home Plant Road Test Vehicle Exhaust	Motor Home Units Produced and Diesel Fuel	2.5 units/hr and 6.058 gallons/hr	None
979-V04-P	979-V04-U	Motor Home Plant Road Test Vehicle Exhaust	Motor Home Units Produced and Diesel Fuel	2.5 units/hr and 6.058 gallons/hr	None

Applicable Requirements

Emission Limits (lb/hr, gr/dscf, lb/MMBtu, % opacity, etc.)

The emissions from the emission points listed in the above table shall not exceed the levels specified below.

Pollutant: Opacity

Emission Limit(s): 40%

Authority for Requirement: 567 IAC 23.3(2)"d"

Pollutant: Particulate Matter

Emission Limit(s): 0.1 gr./dscf

Authority for Requirement: 567 IAC 23.3(2)"a"

Pollutant: Sulfur Dioxide (SO₂)

Emission Limit(s): 2.5 lb./MMBtu

Authority for Requirement: 567 IAC 23.3(3)"b"(2)

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- No person shall allow, cause or permit the combustion of number 1 or number 2 fuel oil exceeding a sulfur content of 0.5 percent by weight.

Authority for Requirement: 567 IAC 23.3(3)"b"(1)

Reporting & Record keeping:

The following records shall be maintained on-site for five (5) years and available for inspection upon request by representatives of the Department of Natural Resources:

- The facility shall monitor the percent of sulfur by weight in the fuel oil as delivered. The documentation may be vendor supplied or facility generated.

Authority for Requirement: 567 IAC 22.108(3)

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

Emission Point ID Number: 978-C02-P

Associated Equipment

Associated Emission Unit ID Numbers: 978-C02-U

Emissions Control Equipment ID Number: none

Applicable Requirements

Emission Unit vented through this Emission Point: 978-C02-U

Emission Unit Description: Small Part E-Coat Tank Housing Exhaust Stack

Raw Material/Fuel: E-Coat Epoxy Resins and Solvent

Rated Capacity: 7.2 gallons/hr

Emission Limits (lb./hr, gr./dscf, lb./MMBtu, % opacity, etc.)

The emissions from this emission point shall not exceed the levels specified below.

Pollutant: Volatile Organic Compounds (VOC)

Emission Limit(s): 17.82 tons/year⁽¹⁾

⁽¹⁾ Combined limit for EP 978-C02, EP 978-O04, and EP 978-O05. VOC emissions are limited by coating usage restrictions in the permit for the dip tank (96-A-100-S1)

Authority for Requirement: Iowa DNR Construction Permit 96-A-100-S1

Operational Limits & Requirements

The owner/operator of this equipment shall comply with the operational limits and requirements listed below.

Process throughput:

- A. The amount of epoxy coating used in the Small Parts E-Coat Tank shall not exceed 51,480 gallons in any rolling twelve-month period.
- B. The amount of solvent used in the Small Parts E-Coat Tank shall not exceed 1,045 gallons in any rolling twelve-month period.
- C. The amount of cationic feed used in the Small Parts E-Coat Tank shall not exceed 330 gallons in any rolling twelve-month period.
- D. The VOC content of the epoxy coating used in the Small Parts E-Coat Tank shall not exceed 0.50 pound per gallon.
- E. The VOC content of any solvent used in the Small Parts E-Coat Tank shall not exceed 7.1 pounds per gallon.
- F. The VOC content of any cationic feed used in the Small Parts E-Coat Tank shall not exceed 7.49 pounds per gallon.

Reporting & Record keeping:

All records as required by this permit shall be kept on-site for a minimum of five (5) years and shall be available for inspection by the DNR. Records shall be legible and maintained in an orderly manner. The permittee shall maintain the following monthly records:

- A. The identification of any material used in the Small Parts E-Coat Tank.
- B. The VOC content of any material used in the Small Parts E-Coat Tank.
- C. The amount of epoxy coating used in the Small Parts E-Coat Tank (gallons).
- D. The rolling 12-month total of the amount of epoxy coating used in the Small Parts E-Coat Tank (gallons).
- E. The amount of solvent used in the Small Parts E-Coat Tank (gallons).
- F. The rolling 12-month total of the amount of solvent used in the Small Parts E-Coat Tank (gallons).
- G. The amount of cationic feed used in the Small Parts E-Coat Tank (gallons).
- H. The rolling 12-month total of the amount of cationic feed used in the Small Parts E-Coat Tank (gallons).

Authority for Requirement: Iowa DNR Construction Permit 96-A-100-S1

NESHAP:

This emission unit is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart M, Surface Coating of Miscellaneous Metal Parts and Products. Please refer to p. 14 of the Plant-Wide Conditions of this permit for more information.

Authority for Requirement: Iowa DNR Construction Permit 96-A-100-S1
567 IAC 23.1(4)

Emission Point Characteristics

The emission point shall conform to the specifications listed below.

Stack Height (feet from the ground): 31

Stack Diameter (inches): 15

Stack Exhaust Flow Rate (scfm): 2,500

Stack Temperature (°F): 70

Discharge Style: Vertical Unobstructed

Authority for Requirement: Iowa DNR Construction Permit 96-A-100-S1

The temperature and flowrate are intended to be representative and characteristic of the design of the permitted emission point. The Department recognizes that the temperature and flow rate may vary with changes in the process and ambient conditions. If it is determined that any of the emission point design characteristics are different than the values stated above, the owner/operator must notify the Department and obtain a permit amendment, if required.

Periodic Monitoring Requirements

The owner/operator of this equipment shall comply with the periodic monitoring requirements listed below.

Agency Approved Operation & Maintenance Plan Required? Yes ☐ No ☒

Facility Maintained Operation & Maintenance Plan Required? Yes ☐ No ☒

Authority for Requirement: 567 IAC 22.108(3)"b"

IV. General Conditions

This permit is issued under the authority of the Iowa Code subsection 455B.133(8) and in accordance with 567 Iowa Administrative Code chapter 22.

G1. Duty to Comply

1. The permittee must comply with all conditions of the Title V permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. *567 IAC 22.108(9)"a"*
2. Any compliance schedule shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based. *567 IAC 22.105 (2)"h"(3)*
3. Where an applicable requirement of the Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions shall be enforceable by the administrator and are incorporated into this permit. *567 IAC 22.108 (1)"b"*
4. Unless specified as either "state enforceable only" or "local program enforceable only", all terms and conditions in the permit, including provisions to limit a source's potential to emit, are enforceable by the administrator and citizens under the Act. *567 IAC 22.108 (14)*
5. It shall not be a defense for a permittee, in an enforcement action, that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. *567 IAC 22.108 (9)"b"*

G2. Permit Expiration

1. Except as provided in 567 IAC 22.104, the expiration of this permit terminates the permittee's right to operate unless a timely and complete application has been submitted for renewal. Any testing required for renewal shall be completed before the application is submitted. *567 IAC 22.116(2)*
2. To be considered timely, the owner, operator, or designated representative (where applicable) of each source required to obtain a Title V permit shall present or mail the Air Quality Bureau, Iowa Department of Natural Resources, Air Quality Bureau, 7900 Hickman Rd, Suite #1, Urbandale, Iowa 50322, four or more copies of a complete permit application, at least 6 months but not more than 18 months prior to the date of permit expiration. The definition of a complete application is as indicated in 567 IAC 22.105(2). *567 IAC 22.105*

G3. Certification Requirement for Title V Related Documents

Any application, report, compliance certification or other document submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. All certifications shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *567 IAC 22.107 (4)*

G4. Annual Compliance Certification

By March 31 of each year, the permittee shall submit compliance certifications for the previous calendar year. The certifications shall include descriptions of means to monitor the compliance status of all emissions sources including emissions limitations, standards, and work practices in accordance with applicable requirements. The certification for a source shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with all applicable department rules. For sources determined not to be in compliance

at the time of compliance certification, a compliance schedule shall be submitted which provides for periodic progress reports, dates for achieving activities, milestones, and an explanation of why any dates were missed and preventive or corrective measures. The compliance certification shall be submitted to the administrator, director, and the appropriate DNR Field office. *567 IAC 22.108 (15)"e"*

G5. Semi-Annual Monitoring Report

By March 31 and September 30 of each year, the permittee shall submit a report of any monitoring required under this permit for the 6 month periods of July 1 to December 31 and January 1 to June 30, respectively. All instances of deviations from permit requirements must be clearly identified in these reports, and the report must be signed by a responsible official, consistent with 567 IAC 22.107(4). The semi-annual monitoring report shall be submitted to the director and the appropriate DNR Field office. *567 IAC 22.108 (5)*

G6. Annual Fee

1. The permittee is required under subrule 567 IAC 22.106 to pay an annual fee based on the total tons of actual emissions of each regulated air pollutant. Beginning July 1, 1996, Title V operating permit fees will be paid on July 1 of each year. The fee shall be based on emissions for the previous calendar year.
2. The fee amount shall be calculated based on the first 4,000 tons of each regulated air pollutant emitted each year. The fee to be charged per ton of pollutant will be available from the department by June 1 of each year. The Responsible Official will be advised of any change in the annual fee per ton of pollutant.
3. The following forms shall be submitted annually by March 31 documenting actual emissions for the previous calendar year.
 - a. Form 1.0 "Facility Identification";
 - b. Form 4.0 "Emissions unit-actual operations and emissions" for each emission unit;
 - c. Form 5.0 "Title V annual emissions summary/fee"; and
 - d. Part 3 "Application certification."
4. The fee shall be submitted annually by July 1. The fee shall be submitted with the following forms:
 - a. Form 1.0 "Facility Identification";
 - b. Form 5.0 "Title V annual emissions summary/fee";
 - c. Part 3 "Application certification."
5. If there are any changes to the emission calculation form, the department shall make revised forms available to the public by January 1. If revised forms are not available by January 1, forms from the previous year may be used and the year of emissions documented changed. The department shall calculate the total statewide Title V emissions for the prior calendar year and make this information available to the public no later than April 30 of each year.
6. Phase I acid rain affected units under section 404 of the Act shall not be required to pay a fee for emissions which occur during the years 1993 through 1999 inclusive.
7. The fee for a portable emissions unit or stationary source which operates both in Iowa and out of state shall be calculated only for emissions from the source while operating in Iowa.
8. Failure to pay the appropriate Title V fee represents cause for revocation of the Title V permit as indicated in 567 IAC 22.115(1)"d".

G7. Inspection of Premises, Records, Equipment, Methods and Discharges

Upon presentation of proper credentials and any other documents as may be required by law, the permittee shall allow the director or the director's authorized representative to:

1. Enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
4. Sample or monitor, at reasonable times, substances or parameters for the purpose of ensuring compliance with the permit or other applicable requirements. *567 IAC 22.108 (15)"b"*

G8. Duty to Provide Information

The permittee shall furnish to the director, within a reasonable time, any information that the director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the director copies of records required to be kept by the permit, or for information claimed to be confidential, the permittee shall furnish such records directly to the administrator of EPA along with a claim of confidentiality. *567 IAC 22.108 (9)"e"*

G9. General Maintenance and Repair Duties

The owner or operator of any air emission source or control equipment shall:

1. Maintain and operate the equipment or control equipment at all times in a manner consistent with good practice for minimizing emissions.
2. Remedy any cause of excess emissions in an expeditious manner.
3. Minimize the amount and duration of any excess emission to the maximum extent possible during periods of such emissions. These measures may include but not be limited to the use of clean fuels, production cutbacks, or the use of alternate process units or, in the case of utilities, purchase of electrical power until repairs are completed.
4. Schedule, at a minimum, routine maintenance of equipment or control equipment during periods of process shutdowns to the maximum extent possible. *567 IAC 24.2(1)*

G10. Recordkeeping Requirements for Compliance Monitoring

1. In addition to any source specific recordkeeping requirements contained in this permit, the permittee shall maintain the following compliance monitoring records, where applicable:

- a. The date, place and time of sampling or measurements
- b. The date the analyses were performed.
- c. The company or entity that performed the analyses.
- d. The analytical techniques or methods used.
- e. The results of such analyses; and
- f. The operating conditions as existing at the time of sampling or measurement.
- g. The records of quality assurance for continuous compliance monitoring systems (including but not limited to quality control activities, audits and calibration drifts.)

2. The permittee shall retain records of all required compliance monitoring data and support information for a period of at least 5 years from the date of compliance monitoring sample, measurement report or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous compliance monitoring, and copies of all reports required by the permit.

3. For any source which in its application identified reasonably anticipated alternative operating scenarios, the permittee shall:

- a. Comply with all terms and conditions of this permit specific to each alternative scenario.
- b. Maintain a log at the permitted facility of the scenario under which it is operating.
- c. Consider the permit shield, if provided in this permit, to extend to all terms and conditions under each operating scenario. *567 IAC 22.108(4), 567 IAC 22.108(12)*

G11. Evidence used in establishing that a violation has or is occurring.

Notwithstanding any other provisions of these rules, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any provisions herein.

1. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at a source:

- a. A monitoring method approved for the source and incorporated in an operating permit pursuant to 567 Chapter 22;
- b. Compliance test methods specified in 567 Chapter 25; or
- c. Testing or monitoring methods approved for the source in a construction permit issued pursuant to 567 Chapter 22.

2. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

- a. Any monitoring or testing methods provided in these rules; or
- b. Other testing, monitoring, or information gathering methods that produce information comparable to that produced by any method in subrule 21.5(1) or this subrule. *567 IAC 21.5(1)-567 IAC 21.5(2)*

G12. Prevention of Accidental Release: Risk Management Plan Notification and Compliance Certification

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Act, the permittee shall notify the department of this requirement. The plan shall be filed with all appropriate authorities by the deadline specified by EPA. A certification that this risk management plan is being properly implemented shall be included in the annual compliance certification of this permit. *567 IAC 22.108(6)*

G13. Hazardous Release

The permittee must report any situation involving the actual, imminent, or probable release of a hazardous substance into the atmosphere which, because of the quantity, strength and toxicity of the substance, creates an immediate or potential danger to the public health, safety or to the environment. A verbal report shall be made to the department at (515) 281-8694 and to the local police department or the office of the sheriff of the affected county as soon as possible but not later than six hours after the discovery or onset of the condition. This verbal report must be followed up with a written report as indicated in 567 IAC 131.2(2). *567 IAC Chapter 131-State Only*

G14. Excess Emissions and Excess Emissions Reporting Requirements

1. Excess Emissions. Excess emission during a period of startup, shutdown, or cleaning of control equipment is not a violation of the emission standard if the startup, shutdown or cleaning is accomplished expeditiously and in a manner consistent with good practice for minimizing emissions. Cleaning of control equipment which does not require the shutdown of the process equipment shall be limited to one six-minute period per one-hour period. An incident of excess emission (other than an incident during startup, shutdown or cleaning of control equipment) is a violation. If the owner or operator of a source maintains that the incident of excess emission was due to a malfunction, the owner or operator must show that the conditions which caused the incident of excess emission were not preventable by reasonable maintenance and control

measures. Determination of any subsequent enforcement action will be made following review of this report. If excess emissions are occurring, either the control equipment causing the excess emission shall be repaired in an expeditious manner or the process generating the emissions shall be shutdown within a reasonable period of time. An expeditious manner is the time necessary to determine the cause of the excess emissions and to correct it within a reasonable period of time. A reasonable period of time is eight hours plus the period of time required to shut down the process without damaging the process equipment or control equipment. In the case of an electric utility, a reasonable period of time is eight hours plus the period of time until comparable generating capacity is available to meet consumer demand with the affected unit out of service, unless, the director shall, upon investigation, reasonably determine that continued operation constitutes an unjustifiable environmental hazard and issue an order that such operation is not in the public interest and require a process shutdown to commence immediately.

2. Excess Emissions Reporting

a. Oral Reporting of Excess Emissions. An incident of excess emission (other than an incident of excess emission during a period of startup, shutdown, or cleaning) shall be reported to the appropriate field office of the department within eight hours of, or at the start of the first working day following the onset of the incident. The reporting exemption for an incident of excess emission during startup, shutdown or cleaning does not relieve the owner or operator of a source with continuous monitoring equipment of the obligation of submitting reports required in 567-subrule 25.1(6). An oral report of excess emission is not required for a source with operational continuous monitoring equipment (as specified in 567-subrule 25.1(1)) if the incident of excess emission continues for less than 30 minutes and does not exceed the applicable visible emission standard by more than 10 percent opacity. The oral report may be made in person or by telephone and shall include as a minimum the following:

- i. The identity of the equipment or source operation from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and expected duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps being taken to remedy the excess emission.
- vi. The steps being taken to limit the excess emission in the interim period.

b. Written Reporting of Excess Emissions. A written report of an incident of excess emission shall be submitted as a follow-up to all required oral reports to the department within seven days of the onset of the upset condition, and shall include as a minimum the following:

- i. The identity of the equipment or source operation point from which the excess emission originated and the associated stack or emission point.
- ii. The estimated quantity of the excess emission.
- iii. The time and duration of the excess emission.
- iv. The cause of the excess emission.
- v. The steps that were taken to remedy and to prevent the recurrence of the incident of excess emission.
- vi. The steps that were taken to limit the excess emission.
- vii. If the owner claims that the excess emission was due to malfunction, documentation to support this claim. 567 IAC 24.1(1)-567 IAC 24.1(4)

3. Emergency Defense for Excess Emissions. For the purposes of this permit, an “emergency” means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include non-compliance, to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation or operator error. An emergency constitutes an affirmative defense to an action brought for non-compliance with technology based limitations if it can be demonstrated through properly signed contemporaneous operating logs or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The facility at the time was being properly operated;
- c. During the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements of the permit; and
- d. The permittee submitted notice of the emergency to the director by certified mail within two working days of the time when the emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. *567 IAC 22.108(16)*

G15. Permit Deviation Reporting Requirements

A deviation is any failure to meet a term, condition or applicable requirement in the permit. Reporting requirements for deviations that result in a hazardous release or excess emissions have been indicated above (see G13 and G14). Unless more frequent deviation reporting is specified in the permit, any other deviation shall be documented in the semi-annual monitoring report and the annual compliance certification (see G4 and G5). *567 IAC 22.108(5)"b"*

G16. Notification Requirements for Sources That Become Subject to NSPS and NESHAP Regulations

During the term of this permit, the permittee must notify the department of any source that becomes subject to a standard or other requirement under 567-subrule 23.1(2) (standards of performance of new stationary sources) or section 111 of the Act; or 567-subrule 23.1(3) (emissions standards for hazardous air pollutants), 567-subrule 23.1(4) (emission standards for hazardous air pollutants for source categories) or section 112 of the Act. This notification shall be submitted in writing to the department pursuant to the notification requirements in 40 CFR Section 60.7, 40 CFR Section 61.07, and/or 40 CFR Section 63.9. *567 IAC 23.1(2), 567 IAC 23.1(3), 567 IAC 23.1(4)*

G17. Requirements for Making Changes to Emission Sources That Do Not Require Title V Permit Modification

1. Off Permit Changes to a Source. Pursuant to section 502(b)(10) of the CAAA, the permittee may make changes to this installation/facility without revising this permit if:

- a. The changes are not major modifications under any provision of any program required by section 110 of the Act, modifications under section 111 of the act, modifications under section 112 of the act, or major modifications as defined in 567 IAC Chapter 22.
- b. The changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions);
- c. The changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed

therein as a rate of emissions or as total emissions);

d. The changes are not subject to any requirement under Title IV of the Act.

e. The changes comply with all applicable requirements.

f. For such a change, the permitted source provides to the department and the administrator by certified mail, at least 30 days in advance of the proposed change, a written notification, including the following, which must be attached to the permit by the source, the department and the administrator:

i. A brief description of the change within the permitted facility,

ii. The date on which the change will occur,

iii. Any change in emission as a result of that change,

iv. The pollutants emitted subject to the emissions trade

v. If the emissions trading provisions of the state implementation plan are invoked, then Title V permit requirements with which the source shall comply; a description of how the emissions increases and decreases will comply with the terms and conditions of the Title V permit.

vi. A description of the trading of emissions increases and decreases for the purpose of complying with a federally enforceable emissions cap as specified in and in compliance with the Title V permit; and

vii. Any permit term or condition no longer applicable as a result of the change.

567 IAC 22.110(1)

2. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements. *567 IAC 22.110(2)*

3. Notwithstanding any other part of this rule, the director may, upon review of a notice, require a stationary source to apply for a Title V permit if the change does not meet the requirements of subrule 22.110(1). *567 IAC 22.110(3)*

4. The permit shield provided in subrule 22.108(18) shall not apply to any change made pursuant to this rule. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the state implementation plan authorizing the emissions trade. *567 IAC 22.110(4)*

5. Aggregate Insignificant Emissions. The permittee shall not construct, establish or operate any new insignificant activities or modify any existing insignificant activities in such a way that the emissions from these activities no longer meet the criteria of aggregate insignificant emissions. If the aggregate insignificant emissions are expected to be exceeded, the permittee shall submit the appropriate permit modification and receive approval prior to making any change. *567 IAC 22.103(2)*

6. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes, for changes that are provided for in this permit. *567 IAC 22.108(11)*

G18. Duty to Modify a Title V Permit

1. Administrative Amendment.

a. An administrative permit amendment is a permit revision that is required to do any of the following:

i. Correct typographical errors

ii. Identify a change in the name, address, or telephone number of any person identified in the permit, or provides a similar minor administrative change at the

source;

iii. Require more frequent monitoring or reporting by the permittee; or
iv. Allow for a change in ownership or operational control of a source where the director determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the director.

b. The permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. The request shall be submitted to the director.

c. Administrative amendments to portions of permits containing provisions pursuant to Title IV of the Act shall be governed by regulations promulgated by the administrator under Title IV of the Act.

2. Minor Permit Modification.

a. Minor permit modification procedures may be used only for those permit modifications that do any of the following:

- i. Do not violate any applicable requirements
- ii. Do not involve significant changes to existing monitoring, reporting or recordkeeping requirements in the Title V permit.
- iii. Do not require or change a case by case determination of an emission limitation or other standard, or increment analysis.
- iv. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include any federally enforceable emissions caps which the source would assume to avoid classification as a modification under any provision under Title I of the Act; and an alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Act.;
- v. Are not modifications under any provision of Title I of the Act; and
- vi. Are not required to be processed as significant modification.

b. An application for minor permit revision shall be on the minor Title V modification application form and shall include at least the following:

- i. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs.
- ii. The permittee's suggested draft permit
- iii. Certification by a responsible official, pursuant to 567 IAC 22.107(4), that the proposed modification meets the criteria for use of a minor permit modification procedures and a request that such procedures be used; and
- iv. Completed forms to enable the department to notify the administrator and the affected states as required by 567 IAC 22.107(7).

c. The permittee may make the change proposed in its minor permit modification application immediately after it files the application. After the permittee makes this change and until the director takes any of the actions specified in 567 IAC 22.112(4) "a" to "c", the permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time, the permittee need not comply with the existing permit terms and conditions it seeks to modify.

However, if the permittee fails to comply with its proposed permit terms and conditions during this time period, existing permit term terms and conditions it seeks to modify may subject the facility to enforcement action.

3. Significant Permit Modification. Significant Title V modification procedures shall be used for applications requesting Title V permit modifications that do not qualify as minor Title V modifications or as administrative amendments. These include but are not limited to all significant changes in monitoring permit terms, every relaxation of reporting or recordkeeping permit terms, and any change in the method of measuring compliance with existing requirements. Significant Title V modifications shall meet all requirements of 567 IAC Chapter 22, including those for applications, public participation, review by affected states, and review by the administrator, and those requirements that apply to Title V issuance and renewal. *567 IAC 22.111-567 IAC 22.113* The permittee shall submit an application for a significant permit modification not later than three months after commencing operation of the changed source unless the existing Title V permit would prohibit such construction or change in operation, in which event the operation of the changed source may not commence until the department revises the permit. *567 IAC 22.105(1)"a"(4)*

G19. Duty to Obtain Construction Permits

Unless exempted under 567 IAC 22.1(2), the permittee must not construct, install, reconstruct, or alter any equipment, control equipment or anaerobic lagoon without first obtaining a construction permit, conditional permit, or permit pursuant to 567 IAC 22.8, or permits required pursuant to 567 IAC 22.4 and 567 IAC 22.5. Such permits shall be obtained prior to the initiation of construction, installation or alteration of any portion of the stationary source. *567 IAC 22.1(1)*

G20. Asbestos

The permittee shall comply with 567 IAC 23.1(3)"a", and 567 IAC 23.2(3)"g" when conducting any renovation or demolition activities at the facility. *567 IAC 23.1(3)"a", and 567 IAC 23.2*

G21. Open Burning

The permittee is prohibited from conducting open burning, except as may be allowed by 567 IAC 23.2. *567 IAC 23.2 except 23.2(3)"h"; 567 IAC 23.2(3)"h" - State Only*

G22. Acid Rain (Title IV) Emissions Allowances

The permittee shall not exceed any allowances that it holds under Title IV of the Act or the regulations promulgated there under. Annual emissions of sulfur dioxide in excess of the number of allowances to emit sulfur dioxide held by the owners and operators of the unit or the designated representative of the owners and operators is prohibited. Exceedences of applicable emission rates are prohibited. "Held" in this context refers to both those allowances assigned to the owners and operators by USEPA, and those allowances supplementally acquired by the owners and operators. The use of any allowance prior to the year for which it was allocated is prohibited. Contravention of any other provision of the permit is prohibited. *567 IAC 22.108(7)*

G23. Stratospheric Ozone and Climate Protection (Title VI) Requirements

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a. All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to § 82.106.

- b. The placement of the required warning statement must comply with the requirements pursuant to § 82.108.
 - c. The form of the label bearing the required warning statement must comply with the requirements pursuant to § 82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in § 82.112.
- 2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with reporting and recordkeeping requirements pursuant to § 82.166. ("MVAC-like appliance" as defined at § 82.152)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to § 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.
- 3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant,
- 5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *40 CFR part 82*

G24. Permit Reopenings

- 1. This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *567 IAC 22.108(9)"c"*
- 2. Additional applicable requirements under the Act become applicable to a major part 70 source with a remaining permit term of 3 or more years. Revisions shall be made as expeditiously as practicable, but not later than 18 months after the promulgation of such standards and regulations.

- a. Reopening and revision on this ground is not required if the permit has a remaining term of less than three years;
 - b. Reopening and revision on this ground is not required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 70.4(b)(10)(i) or (ii) as amended to June 25, 1993.
 - c. Reopening and revision on this ground is not required if the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. *567 IAC 22.108(17)"a", 567 IAC 22.108(17)"b"*
3. A permit shall be reopened and revised under any of the following circumstances:
- a. The department receives notice that the administrator has granted a petition for disapproval of a permit pursuant to 40 CFR 70.8(d) as amended to June 25, 1993, provided that the reopening may be stayed pending judicial review of that determination;
 - b. The department or the administrator determines that the Title V permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Title V permit;
 - c. Additional applicable requirements under the Act become applicable to a Title V source, provided that the reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the source and the source receives approval for coverage under that general permit. Such a reopening shall be complete not later than 18 months after promulgation of the applicable requirement.
 - d. Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - e. The department or the administrator determines that the permit must be revised or revoked to ensure compliance by the source with the applicable requirements. *567 IAC 22.114(1)*
4. Proceedings to reopen and reissue a Title V permit shall follow the procedures applicable to initial permit issuance and shall effect only those parts of the permit for which cause to reopen exists. *567 IAC 22.114(2)*

G25. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements included in this permit as of the date of permit issuance.

This permit shield shall not alter or affect the following:

- 1. The provisions of section 303 of the Act (emergency orders), including the authority of the administrator under that section;
- 2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- 3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Act;
- 4. The ability of the department or the administrator to obtain information from the facility pursuant to section 114 of the Act. *567 IAC 22.108 (18)*

G26. Severability

The provisions of this permit are severable and if any provision or application of any provision is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding. 567 IAC 22.108 (8)

G27. Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege. 567 IAC 22.108 (9)"d"

G28. Transferability

This permit is not transferable from one source to another. If title to the facility or any part of it is transferred, an administrative amendment to the permit must be sought to determine transferability of the permit. 567 IAC 22.111 (1)"d"

G29. Disclaimer

No review has been undertaken on the engineering aspects of the equipment or control equipment other than the potential of that equipment for reducing air contaminant emissions. 567 IAC 22.3(3)"c"

G30. Notification and Reporting Requirements for Stack Tests or Monitor Certification

The permittee shall notify the department's stack test contact in writing not less than 30 days before a required test or performance evaluation of a continuous emission monitor is performed to determine compliance with an applicable requirement. For the department to consider test results a valid demonstration of compliance with applicable rules or a permit condition, such notice shall be given. Such notice shall include the time, the place, the name of the person who will conduct the test and other information as required by the department. Unless specifically waived by the department's stack test contact, a pretest meeting shall be held not later than 15 days prior to conducting the compliance demonstration. The department may accept a testing protocol in lieu of a pretest meeting. A representative of the department shall be permitted to witness the tests. Results of the tests shall be submitted in writing to the department's stack test contact in the form of a comprehensive report within six weeks of the completion of the testing. Compliance tests conducted pursuant to this permit shall be conducted with the source operating in a normal manner at its maximum continuous output as rated by the equipment manufacturer, or the rate specified by the owner as the maximum production rate at which the source shall be operated. In cases where compliance is to be demonstrated at less than the maximum continuous output as rated by the equipment manufacturer, and it is the owner's intent to limit the capacity to that rating, the owner may submit evidence to the department that the source has been physically altered so that capacity cannot be exceeded, or the department may require additional testing, continuous monitoring, reports of operating levels, or any other information deemed necessary by the department to determine whether such source is in compliance.

Stack test notifications, reports and correspondence shall be sent to:

Stack Test Review Coordinator
Iowa DNR, Air Quality Bureau
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-6001

Within Polk and Linn Counties, stack test notifications, reports and correspondence shall also be directed to the supervisor of the respective county air pollution program.

567 IAC 25.1(7)"a", 567 IAC 25.1(9)

G31. Prevention of Air Pollution Emergency Episodes

The permittee shall comply with the provisions of 567 IAC Chapter 26 in the prevention of excessive build-up of air contaminants during air pollution episodes, thereby preventing the occurrence of an emergency due to the effects of these contaminants on the health of persons.
567 IAC 26.1(1)

G32. Contacts List

The current address and phone number for reports and notifications to the EPA administrator is:

Chief of Air Permits
EPA Region 7
Air Permits and Compliance Branch
901 N. 5th Street
Kansas City, KS 66101
(913) 551-7020

The current address and phone number for reports and notifications to the department or the Director is:

Chief, Air Quality Bureau
Iowa Department of Natural Resources
7900 Hickman Road, Suite #1
Urbandale, IA 50322
(515) 242-5100

Reports or notifications to the DNR Field Offices or local programs shall be directed to the supervisor at the appropriate field office or local program. Current addresses and phone numbers are:

Field Office 1

909 West Main – Suite 4
Manchester, IA 52057
(563) 927-2640

Field Office 2

P.O. Box 1443
2300-15th St., SW
Mason City, IA 50401
(641) 424-4073

Field Office 3

1900 N. Grand Ave.
Spencer, IA 51301
(712) 262-4177

Field Office 4

1401 Sunnyside Lane
Atlantic, IA 50022
(712) 243-1934

Field Office 5

401 SW 7th Street, Suite I
Des Moines, IA 50309
(515) 725-0268

Field Office 6

1023 W. Madison St.
Washington, IA 52353-1623
(319) 653-2135

Polk County Public Health Dept.

Air Quality Division
5885 NE 14th St.
Des Moines, IA 50313
(515) 286-3351

Linn County Public Health Dept.

Air Pollution Control Division
501 13th St., NW
Cedar Rapids, IA 52405
(319) 892-6000

V. Appendix A: 40 CFR 63 Subpart JJ Tables

Table 2. List of Volatile Hazardous Air Pollutants

Chemical Name	CAS No.
Acetaldehyde	75070
Acetamide	60355
Acetonitrile	75058
Acetophenone	98862
2-Acetylaminofluorine	53963
Acrolein	107028
Acrylamide	79061
Acrylic acid	79107
Acrylonitrile	107131
Allyl chloride	107051
4-Aminobiphenyl	92671
Aniline	62533
o-Anisidine	90040
Benzene	71432
Benzidine	92875
Benzotrichloride	98077
Benzyl chloride	100447
Biphenyl	92524
Bis (2-ethylhexyl) phthalate (DEHP)	117817
Bis (chloromethyl) ether	542881
Bromoform	75252
1,3-Butadiene	106990
Carbon disulfide	75150
Carbon tetrachloride	56235
Carbonyl sulfide	463581
Catechol	120809
Chloroacetic acid	79118
2-Chloroacetophenone	532274
Chlorobenzene	108907
Chloroform	67663
Chloromethyl methyl ether	107302
Chloroprene	126998
Cresols (isomers and mixture)	1319773
o-Cresol	95487
m-Cresol	108394
p-Cresol	106445
Cumene	98828
2,4-D (2,4-Dichlorophenoxyacetic acid, including salts and esters)	94757
DDE (1,1-Dichloro-2,2-bis(p-chlorophenyl)ethylene)	72559
Diazomethane	334883
Dibenzofuran	132649
1,2-Dibromo-3-chloropropane	96128
Dibutylphthalate	84742
1,4-Dichlorobenzene	106467
3,3'-Dichlorobenzidine	91941
Dichloroethyl ether (Bis(2-chloroethyl)ether)	111444
1,3-Dichloropropene	542756
Diethanolamine	111422
N,N-Dimethylaniline	121697
Diethyl sulfate	64675
3,3'-Dimethoxybenzidine	119904
4-Dimethylaminoazobenzene	60117

Table 2. (continued)

Chemical Name	CAS No.
3,3'-Dimethylbenzidine	119937
Dimethylcarbamoyl chloride	79447
N,N-Dimethylformamide	68122
1,1-Dimethylhydrazine	57147
Dimethyl phthalate	131113
Dimethyl sulfate	77781
4,6-Dinitro-o-cresol, and salts	534521
2,4-Dinitrophenol	51285
2,4-Dinitrotoluene	121142
1,4-Dioxane (1,4-Diethyleneoxide)	123911
1,2-Diphenylhydrazine	122667
Epichlorohydrin (1-Chloro-2,3-epoxypropane)	106898
1,2-Epoxybutane	106887
Ethyl acrylate	140885
Ethylbenzene	100414
Ethyl carbamate (Urethane)	51796
Ethyl chloride (Chloroethane)	75003
Ethylene dibromide (Dibromoethane)	106934
Ethylene dichloride (1,2-Dichloroethane)	107062
Ethylene glycol	107211
Ethylene oxide	75218
Ethylenethiourea	96457
Ethylidene dichloride (1,1-Dichloroethane)	75343
Formaldehyde	50000
Glycolethers ^a	
Hexachlorobenzene	118741
Hexachloro-1,3-butadiene	87683
Hexachloroethane	67721
Hexamethylene-1,6-diisocyanate	822060
Hexamethylphosphoramide	680319
Hexane	110543
Hydrazine	302012
Hydroquinone	123319
Isophorone	78591
Maleic anhydride	108316
Methanol	67561
Methyl bromide (Bromomethane)	74839
Methyl chloride (Chloromethane)	74873
Methyl chloroform (1,1,1-Trichloroethane)	71556
Methyl ethyl ketone (2-Butanone)	78933
Methylhydrazine	60344
Methyl iodide (Iodomethane)	74884
Methyl isobutyl ketone (Hexone)	108101
Methyl isocyanate	624839
Methyl methacrylate	80626
Methyl tert-butyl ether	1634044
4,4'-Methylenebis (2-chloroaniline)	101144
Methylene chloride (Dichloromethane)	75092
4,4'-Methylenediphenyl diisocyanate (MDI)	101688
4,4'-Methylenedianiline	101779
Naphthalene	91203
Nitrobenzene	98953

Table 2. (continued)

Chemical Name	CAS No.
4-Nitrobiphenyl	92933
4-Nitrophenol	100027
2-Nitropropane	79469
N-Nitroso-N-methylurea	684935
N-Nitrosodimethylamine	62759
N-Nitrosomorpholine	59892
Phenol	108952
p-Phenylenediamine	106503
Phosgene	75445
Phthalic anhydride	85449
Polychlorinated biphenyls (Aroclors)	1336363
Polycyclic Organic Matter ^b	
1,3-Propane sultone	1120714
beta-Propiolactone	57578
Propionaldehyde	123386
Propoxur (Baygon)	114261
Propylene dichloride (1,2-Dichloropropane)	78875
Propylene oxide	75569
1,2-Propylenimine (2-Methyl aziridine)	75558
Quinone	106514
Styrene	100425
Styrene oxide	96093
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016
1,1,2,2-Tetrachloroethane	79345
Tetrachloroethylene (Perchloroethylene)	127184
Toluene	108883
2,4-Toluenediamine	95807
Toluene-2,4-diisocyanate	584849
o-Toluidine	95534
1,2,4-Trichlorobenzene	120821
1,1,2-Trichloroethane	79005
Trichloroethylene	79016
2,4,5-Trichlorophenol	95954
2,4,6-Trichlorophenol	88062
Triethylamine	121448
Trifluralin	1582098
2,2,4-Trimethylpentane	540841
Vinyl acetate	108054
Vinyl bromide	593602
Vinyl chloride	75014
Vinylidene chloride (1,1-Dichloroethylene)	75354
Xylenes (isomers and mixture)	1330207
o-Xylene	95476
m-Xylene	108383
p-Xylene	106423

^a Includes mono- and di-ethers of ethylene glycol, diethylene glycols and triethylene glycol; R-(OCH₂ CH₂)_n RR-OR where:

n = 1, 2, or 3; R = alkyl or aryl groups

R' = R, H, or groups which, when removed, yield glycol ethers with the structure:

R-(OCH₂ CH₂)_n-OH. Polymers are excluded from the glycol category.

^b Includes organic compounds with more than one benzene ring, and which have a boiling point greater than or equal to 100 deg.C.

Table 3. Summary of Emission Limits

Emission Point	Existing Source	New Source
<u>Finishing Operations:</u>		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	^a 1.0	^a 0.8
(b) Use compliant finishing materials (maximum kg HAP/kg solids [lb VHAP/lb solids], as applied):		
--stains	^a 1.0	^a 1.0
--washcoats	^{a,b} 1.0	^{a,b} 0.8
--sealers	^a 1.0	^a 0.8
--topcoats	^a 1.0	^a 0.8
--basecoats	^{a,b} 1.0	^{a,b} 0.8
--enamels	^{a,b} 1.0	^{a,b} 0.8
--thinners (maximum % HAP allowable); or	10.0	10.0
(c) As an alternative, use control device; or	^c 1.0	^c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
<u>Cleaning Operations:</u>		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8	0.8
<u>Contact Adhesives:</u>		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates	^d NA	^d NA
ii. For foam adhesives used in products that meet flammability requirements	1.8	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.0	0.2
(b) Use a control device	^e 1.0	^e 0.2

^aThe limits refer to the VHAP content of the coating, as applied.

^bWashcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent HAP by weight.

^cThe control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^dThere is no limit on the VHAP content of these adhesives.

^eThe control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

Table 4. Pollutants Excluded From Use in Cleaning and Washoff Solvents

Chemical Name	CAS No.
4-Aminobiphenyl	92671
Styrene oxide	96093
Diethyl sulfate	64675
N-Nitrosomorpholine	59892
Dimethyl formamide	68122
Hexamethylphosphoramide	680319
Acetamide	60355
4,4'-Methylenedianiline	101779
o-Anisidine	90040
2,3,7,8-Tetrachlorodibenzo-p-dioxin	1746016
Beryllium salts	
Benzidine	92875
N-Nitroso-N-methylurea	684935
Bis (chloromethyl) ether	542881
Dimethyl carbamoyl chloride	79447
Chromium compounds (hexavalent)	
1,2-Propylenimine (2-Methyl aziridine)	75558
Arsenic and inorganic arsenic compounds	99999904
Hydrazine	302012
1,1-Dimethyl hydrazine	57147
Beryllium compounds	7440417
1,2-Dibromo-3-chloropropane	96128
N-Nitrosodimethylamine	62759
Cadmium compounds	
Benzo (a) pyrene	50328
Polychlorinated biphenyls (Aroclors)	1336363
Heptachlor	76448
3,3'-Dimethyl benzidine	119937
Nickel subsulfide	12035722
Acrylamide	79061
Hexachlorobenzene	118741
Chlordane	57749
1,3-Propane sultone	1120714
1,3-Butadiene	106990
Nickel refinery dust	
2-Acetylaminoflourine	53963
3,3'-Dichlorobenzidine	53963
Lindane (hexachlorocyclohexane, gamma)	58899
2,4-Toluene diamine	95807
Dichloroethyl ether (Bis(2-chloroethyl) ether)	111444
1,2-Diphenylhydrazine	122667
Toxaphene (chlorinated camphene)	8001352
2,4-Dinitrotoluene	121142
3,3'-Dimethoxybenzidine	119904
Formaldehyde	50000
4,4'-Methylene bis (2-chloroaniline)	101144
Acrylonitrile	107131
Ethylene dibromide (1,2-Dibromoethane)	106934
DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	72559
Chlorobenzilate	510156
Dichlorvos	62737
Vinyl chloride	75014

Table 4. (continued)

Chemical Name	CAS No.
Coke Oven Emissions	
Ethylene oxide	75218
Ethylene thiourea	96457
Vinyl bromide (bromoethene)	593602
Selenium sulfide (mono and di)	7488564
Chloroform	67663
Pentachlorophenol	87865
Ethyl carbamate (Urethane)	51796
Ethylene dichloride (1,2-Dichloroethane)	107062
Propylene dichloride (1,2-Dichloropropane)	78875
Carbon tetrachloride	56235
Benzene	71432
Methyl hydrazine	60344
Ethyl acrylate	140885
Propylene oxide	75569
Aniline	62533
1,4-Dichlorobenzene(p)	106467
2,4,6-Trichlorophenol	88062
Bis (2-ethylhexyl) phthalate (DEHP)	117817
o-Toluidine	95534
Propoxur	114261
1,4-Dioxane (1,4-Diethyleneoxide)	123911
Acetaldehyde	75070
Bromoform	75252
Captan	133062
Epichlorohydrin	106898
Methylene chloride (Dichloromethane)	75092
Dibenz (ah) anthracene	53703
Chrysene	218019
Dimethyl aminoazobenzene	60117
Benzo (a) anthracene	56553
Benzo (b) fluoranthene	205992
Antimony trioxide	1309644
2-Nitropropane	79469
1,3-Dichloropropene	542756
7, 12-Dimethylbenz(a) anthracene	57976
Benz(c) acridine	225514
Indeno(1,2,3-cd)pyrene	193395
1,2:7,8-Dibenzopyrene	189559

Table 5.--List of VHAP of Potential Concern Identified by Industry

CAS No.	Chemical Name	EPA de minimis, tons/yr
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methylene chloride	4.0
79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

Table 6. VHAP of Potential Concern

CAS No.	Chemical Name	EPA de minimis, tons/yr*
92671	4-Aminobiphenyl	1.0
96093	Styrene oxide	1.0
64675	Diethyl sulfate	1.0
59892	N-Nitrosomorpholine	1.0
68122	Dimethyl formamide	1.0
680319	Hexamethylphosphoramide	0.01
60355	Acetamide	1.0
101779	4,4'-Methylenedianiline	1.0
90040	o-Anisidine	1.0
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	0.00000006
92875	Benzidine	0.00003
684935	N-Nitroso-N-methylurea	0.00002
542881	Bis(chloromethyl) ether	0.00003
79447	Dimethyl carbamoyl chloride	0.002
75558	1,2-Propylenimine (2-Methyl aziridine)	0.0003
57147	1,1-Dimethyl hydrazine	0.0008
96128	1,2-Dibromo-3-chloropropane	0.001
62759	N-Nitrosodimethylamine	0.0001
50328	Benzo (a) pyrene	0.001
1336363	Polychlorinated biphenyls (Aroclors)	0.0009
76448	Heptachlor	0.002
119937	3,3'-Dimethyl benzidine	0.001
79061	Acrylamide	0.002
118741	Hexachlorobenzene	0.004
57749	Chlordane	0.005
1120714	1,3-Propane sultone	0.003
106990	1,3-Butadiene	0.007
53963	2-Acetylaminoflourine	0.0005
91941	3,3'-Dichlorobenzidine	0.02
58899	Lindane (hexachlorocyclohexane, gamma)	0.005
95807	2,4-Toluene diamine	0.002
111444	Dichloroethyl ether (Bis(2-chloroethyl)ether)	0.006
122667	1,2--Diphenylhydrazine	0.009
8001352	Toxaphene (chlorinated camphene)	0.006
121142	2,4-Dinitrotoluene	0.002
119904	3,3'-Dimethoxybenzidine	0.01
50000	Formaldehyde	0.2

Table 6. (continued)

CAS No.	Chemical Name	EPA de minimis, tons/yr*
101144	4,4'-Methylene bis(2-chloroaniline)	0.02
107131	Acrylonitrile	0.03
106934	Ethylene dibromide(1,2-Dibromoethane)	0.01
72559	DDE (1,1-p-chlorophenyl 1-2 dichloroethylene)	0.01
510156	Chlorobenzilate	0.04
62737	Dichlorvos	0.02
75014	Vinyl chloride	0.02
75218	Ethylene oxide	0.09
96457	Ethylene thiourea	0.06
593602	Vinyl bromide (bromoethene)	0.06
67663	Chloroform	0.09
87865	Pentachlorophenol	0.07
51796	Ethyl carbamate (Urethane)	0.08
107062	Ethylene dichloride (1,2-Dichloroethane)	0.08
78875	Propylene dichloride (1,2-Dichloropropane)	0.1
56235	Carbon tetrachloride	0.1
71432	Benzene	0.2
140885	Ethyl acrylate	0.1
75569	Propylene oxide	0.5
62533	Aniline	0.1
106467	1,4-Dichlorobenzene(p)	0.3
88062	2,4,6-Trichlorophenol	0.6
117817	Bis (2-ethylhexyl) phthalate (DEHP)	0.5
95534	o-Toluidine	0.4
114261	Propoxur	2.0
79016	Trichloroethylene	1.0
123911	1,4-Dioxane (1,4-Diethyleneoxide)	0.6
75070	Acetaldehyde	0.9
75252	Bromoform	2.0
133062	Captan	2.0
106898	Epichlorohydrin	2.0
75092	Methylene chloride (Dichloromethane)	4.0
127184	Tetrachloroethylene (Perchloroethylene)	4.0
53703	Dibenz (ah) anthracene	0.01
218019	Chrysene	0.01
60117	Dimethyl aminoazobenzene	1.0
56553	Benzo (a) anthracene	0.01
205992	Benzo (b) fluoranthene	0.01
79469	2-Nitropropane	1.0
542756	1,3-Dichloropropene	1.0
57976	7,12-Dimethylbenz (a) anthracene	0.01
225514	Benz(c)acridine	0.01
193395	Indeno(1,2,3-cd)pyrene	0.01
189559	1,2:7,8-Dibenzopyrene	0.01
79345	1,1,2,2-Tetrachloroethane	0.03
91225	Quinoline	0.0006
75354	Vinylidene chloride (1,1-Dichloroethylene)	0.04
87683	Hexachlorobutadiene	0.09
82688	Pentachloronitrobenzene (Quintobenzene)	0.03
78591	Isophorone	0.7

Table 6. (continued)

CAS No.	Chemical Name	EPA de minimis, tons/yr*
79005	1,1,2-Trichloroethane	0.1
74873	Methyl chloride (Chloromethane)	1.0
67721	Hexachloroethane	0.5
1582098	Trifluralin	0.9
1319773	Cresols/Cresylic acid (isomers and mixture)	1.0
108394	m-Cresol	1.0
75343	Ethylidene dichloride (1,1-Dichloroethane)	1.0
95487	o-Cresol	1.0
106445	p-Cresol	1.0
74884	Methyl iodide (Iodomethane)	1.0
100425	Styrene	1.0
107051	Allyl chloride	1.0
334883	Diazomethane	1.0
95954	2,4,5--Trichlorophenol	1.0
133904	Chloramben	1.0
106887	1,2--Epoxybutane	1.0
108054	Vinyl acetate	1.0
126998	Chloroprene	1.0
123319	Hydroquinone	1.0
92933	4-Nitrobiphenyl	1.0
56382	Parathion	0.1
13463393	Nickel Carbonyl	0.1
60344	Methyl hydrazine	0.006
151564	Ethylene imine	0.0003
77781	Dimethyl sulfate	0.1
107302	Chloromethyl methyl ether	0.1
57578	beta-Propiolactone	0.1
100447	Benzyl chloride	0.04
98077	Benzotrichloride	0.0006
107028	Acrolein	0.04
584849	2,4--Toluene diisocyanate	0.1
75741	Tetramethyl lead	0.01
78002	Tetraethyl lead	0.01
12108133	Methylcyclopentadienyl manganese	0.1
624839	Methyl isocyanate	0.1
77474	Hexachlorocyclopentadiene	0.1
62207765	Fluomine	0.1
10210681	Cobalt carbonyl	0.1
79118	Chloroacetic acid	0.1
534521	4,6-Dinitro-o-cresol, and salts	0.1
101688	Methylene diphenyl diisocyanate	0.1
108952	Phenol	0.1
62384	Mercury, (acetato-o) phenyl	0.01
98862	Acetophenone	1.0
108316	Maleic anhydride	1.0
532274	2-Chloroacetophenone	0.06
51285	2,4-Dinitrophenol	1.0
109864	2-Methoxy ethanol	10.0
98953	Nitrobenzene	1.0
74839	Methyl bromide (Bromomethane)	10.0

Table 6. (continued)

CAS No.	Chemical Name	EPA de minimis, tons/yr [*]
75150	Carbon disulfide	1.0
121697	N,N-Dimethylaniline	1.0
106514	Quinone	5.0
123386	Propionaldehyde	5.0
120809	Catechol	5.0
85449	Phthalic anhydride	5.0
463581	Carbonyl sulfide	5.0
132649	Dibenzofurans	5.0
100027	4-Nitrophenol	5.0
540841	2,2,4-Trimethylpentane	5.0
111422	Diethanolamine	5.0
822060	Hexamethylene-1,6-diisocyanate	5.0
	Glycol ethers ^a	5.0
	Polycyclic organic matter ^b	0.01

* These values are based on the de minimis levels provided in the proposed rulemaking pursuant to section 112(g) of the Act using a 70-year lifetime exposure duration for all VHAP. Default assumptions and the de minimis values based on inhalation reference doses (RfC) are not changed by this adjustment.

^a Except for ethylene glycol butyl ether, ethylene glycol ethyl ether (2-ethoxy ethanol), ethylene glycol hexyl ether, ethylene glycol methyl ether (2-methoxyethanol), ethylene glycol phenyl ether, ethylene glycol propyl ether, ethylene glycol mono-2-ethylhexyl ether, diethylene glycol butyl ether, diethylene glycol ethyl ether, diethylene glycol methyl ether, diethylene glycol hexyl ether, diethylene glycol phenyl ether, diethylene glycol propyl ether, triethylene glycol butyl ether, triethylene glycol ethyl ether, triethylene glycol methyl ether, triethylene glycol propyl ether, ethylene glycol butyl ether acetate, ethylene glycol ethyl ether acetate, and diethylene glycol ethyl ether acetate.

^b Except for benzo(b)fluoranthene, benzo(a)anthracene, benzo(a)pyrene, 7,12-dimethylbenz(a)anthracene, benz(c)acridine, chrysene, dibenz(ah) anthracene, 1,2:7,8-dibenzopyrene, indeno(1,2,3-cd)pyrene, but including dioxins and furans.

VI. Appendix B: 40 CFR 63 Subpart WWW Tables

VII. Appendix C: DNR Air Quality Policy 3-b-08, Opacity Limits